

# EXHIBIT T

IN THE UNITED STATES DISTRICT FOR THE EASTERN  
DISTRICT OF PENNSYLVANIA

\* \* \*

LISA BARBOUNIS,	:	CIVIL ACTION - LAW
Plaintiff	:	
	:	
vs	:	
	:	
MIDDLE EASTERN FORUM,	:	
et al.,	:	
Defendants	:	NO. 2:19-cv-05030

\* \* \*

Videotaped deposition of MARC FINK, via video conference, taken on Tuesday, November 24, 2020, beginning at 3:03 p.m. before Pamela Pratt, via video conference, Court Reporter and Notary Public in and for the Commonwealth of Pennsylvania.

\* \* \*

## APPEARANCES:

SETH D. CARSON, ESQUIRE  
(Via video conference)  
DEREK SMITH LAW GROUP, PLLC  
1835 Market Street, Suite 2950  
Philadelphia, Pennsylvania 19103  
(215)391-4790  
seth@dereksmithlaw.com

-- Representing the Plaintiff

JONATHAN R. CAVALIER, ESQUIRE  
DAVID J. WALTON, ESQUIRE  
(Via video conference)  
COZEN O'CONNOR  
One Liberty Place  
1650 Market Street  
Philadelphia, Pennsylvania 19103  
(215)665-2000  
dwalton@cozen.com

-- Representing the Defendant  
Middle Eastern Forum

SIDNEY L. GOLD, ESQUIRE  
WILLIAM RIESER, ESQUIRE  
(Via video conference)  
SIDNEY L. GOLD & ASSOCIATES, P.C.  
Eleven Penn Center, Suite 515  
1835 Market Street  
Philadelphia, Pennsylvania 19103  
(215)569-1999  
sgold@discrimlaw.net

-- Representing the Defendant Gregg Roman

## ALSO PRESENT:

Mike Gannone - Videographer  
Steven Levy  
Gregg Roman  
Daniel Pipes

## I N D E X

\* \* \*

WITNESS: Marc Fink

QUESTIONED BY: PAGE

Mr. Carson 5

## E X H I B I T S

\* \* \*

NUMBER	DESCRIPTION	MARKED FOR ID
Fink-1	E-mail - D13	40
Fink-2	E-mail - D2	40
Fink-3	E-mail - D1	52
Fink-4	E-mail - D21-23	61
Fink-6	E-mail - D18	97
Fink-7	E-mail - D-29	97

\* Exhibits were reattained by Attorney Carson  
\* No Exhibit 5 was marked.

<p style="text-align: right;">Page 4</p> <p>1 * * *</p> <p>2 (It is hereby stipulated and agreed by</p> <p>3 and among counsel for the respective parties that</p> <p>4 sealing, certification, and filing are waived and that</p> <p>5 all objections, except as to the form of the question,</p> <p>6 are reserved until the time of trial.)</p> <p>7 * * *</p> <p>8 THE VIDEOGRAPHER: We are now on the</p> <p>9 record. Today's date is Tuesday, November 24th, 2020</p> <p>10 and the time is 3:03 p.m. Eastern Standard Time. This</p> <p>11 is the recorded video deposition of Marc Fink in the</p> <p>12 matter of Lisa Barbounis versus Middle Eastern Forum, et</p> <p>13 al, in United States District for Eastern District of</p> <p>14 Pennsylvania, Case Number 219-cv-05030.</p> <p>15 My name is Michael Gannone from Everest</p> <p>16 Court Reporting and I am the video specialist. The</p> <p>17 court reporter today is Pam Pratt, also from Everest</p> <p>18 Court Reporting. All counsel appearing today will be</p> <p>19 noted on the stenographic record. Will the court</p> <p>20 reporter please swear in the witness.</p> <p>21 * * *</p> <p>22 MARC FINK,</p> <p>23 having been first duly sworn, was</p> <p>24 examined and testified as follows:</p> <p>25 * * *</p>	<p style="text-align: right;">Page 6</p> <p>1 MR. CARSON: And no problem. So noted.</p> <p>2 BY MR. CARSON:</p> <p>3 Q. Mr. Fink, can you please state your full name</p> <p>4 for the record.</p> <p>5 A. Marc Fink.</p> <p>6 Q. And what is your job today?</p> <p>7 A. At the Middle East Forum, I am counselor.</p> <p>8 Q. Is that house counsel for the Middle East</p> <p>9 Forum?</p> <p>10 A. Yep. I have a number of roles within that.</p> <p>11 Q. Can you, kind of, just briefly describe the</p> <p>12 roles you have with Middle East Forum?</p> <p>13 A. Yes. So I am in-house counsel, as you know.</p> <p>14 I am also chief editor which involves a lot of</p> <p>15 fundraising materials. I am also director of the Legal</p> <p>16 Project, it's an external project that assists people</p> <p>17 around the world who are victims of lawfare.</p> <p>18 Q. Victims of what?</p> <p>19 A. Lawfare.</p> <p>20 Q. Lawfare. What's lawfare?</p> <p>21 A. The offensive use of legal action to harass</p> <p>22 or bankrupt people.</p> <p>23 Q. That's an interesting project. How long have</p> <p>24 you held that position, director of the Legal Project,</p> <p>25 with regard to the --</p>
<p style="text-align: right;">Page 5</p> <p>1 EXAMINATION</p> <p>2 * * *</p> <p>3 BY MR. CARSON:</p> <p>4 Q. Good afternoon, Mr. Fink.</p> <p>5 A. Good afternoon.</p> <p>6 Q. As you know, my name is Seth Carson and we're</p> <p>7 here today to take your deposition. And I think you</p> <p>8 probably watched every one of these depositions.</p> <p>9 A. I know the drill.</p> <p>10 Q. So I'm just going to run through them super</p> <p>11 fast; you don't even have to say yes or no. You</p> <p>12 understand you're under oath?</p> <p>13 A. Yes.</p> <p>14 Q. Okay. Keep all your answers verbal. Nods,</p> <p>15 shrugs don't appear on the record, okay? What else?</p> <p>16 I'll ask questions, you'll answer questions. You can</p> <p>17 say whatever you want, yes, no, I don't know, I don't</p> <p>18 remember, any other responsive answer you'd like to</p> <p>19 provide. But if you answer a question, I'm going to</p> <p>20 assume that you understood the question, okay?</p> <p>21 A. Yep.</p> <p>22 Q. All right.</p> <p>23 MR. CAVALIER: Seth, just since I'm</p> <p>24 stepping in here for Dave, just to note, we're going to</p> <p>25 read and sign, reserve all objections.</p>	<p style="text-align: right;">Page 7</p> <p>1 A. I've -- sorry.</p> <p>2 Q. Go ahead.</p> <p>3 A. The question is, how long have I held this</p> <p>4 position?</p> <p>5 Q. Specifically the victims of lawfare.</p> <p>6 A. Well, make it easier. I've been at the</p> <p>7 Middle East Forum since, I believe, 2012 and I think</p> <p>8 within a year or two, I was director of Legal Projects.</p> <p>9 The other positions I've held the whole time.</p> <p>10 Q. And is that -- director of the Legal Project</p> <p>11 for lawfare, is that a project that the Middle East</p> <p>12 Forum sponsors?</p> <p>13 A. Yeah, it's -- I say external project. It is</p> <p>14 part of the Middle East Forum, yes. Middle East Forum</p> <p>15 has different projects, Islamist Watch, Campus Watch,</p> <p>16 Washington Projects and Legal Projects, and I'm director</p> <p>17 of the Legal Project, which is separate from my legal</p> <p>18 counsel responsibilities.</p> <p>19 Q. And you said -- when you were hired --</p> <p>20 sorry -- when were you hired at the Middle East Forum?</p> <p>21 A. 2012.</p> <p>22 Q. And when you were first hired, you were hired</p> <p>23 as in-house counsel?</p> <p>24 A. Yes. I had another role. To confuse you</p> <p>25 more, I was director of Islamist Watch. And as to my --</p>

<p style="text-align: right;">Page 8</p> <p>1 as the work grew, I gave that up.</p> <p>2 Q. Okay. Are you involved in -- strike that.</p> <p>3 We looked at some documents today, one</p> <p>4 of them was called the Middle East Forum Bylaws. Did</p> <p>5 you see that document before?</p> <p>6 A. I saw it when you put it up for Mr. Hollin.</p> <p>7 I'm not familiar with the document, I did not work on</p> <p>8 it.</p> <p>9 Q. Okay. That was actually going to be my</p> <p>10 question. How long has the Middle East Forum been in</p> <p>11 existence?</p> <p>12 A. Oh, you're quizzing me on things. I believe</p> <p>13 1994. Don't -- I'm not a hundred percent sure. I</p> <p>14 believe 1994.</p> <p>15 Q. And those bylaws were already in place when</p> <p>16 you were hired in 2012?</p> <p>17 A. Yes. Yep.</p> <p>18 Q. Can you tell me who hired you in 2012?</p> <p>19 A. Yes. That would be Daniel Pipes and a</p> <p>20 gentleman by the name of Efram Karsh who was the</p> <p>21 director at the time.</p> <p>22 Q. Can you say his name again, please?</p> <p>23 A. Efram Karsh.</p> <p>24 Q. Efram Karsh.</p> <p>25 THE COURT REPORTER: Say it again. I'm</p>	<p style="text-align: right;">Page 10</p> <p>1 the Middle East Forum until when?</p> <p>2 A. Oh, goodness.</p> <p>3 Q. Ballpark.</p> <p>4 A. I just don't remember. Maybe a year, maybe a</p> <p>5 year-and-a-half, two years.</p> <p>6 Q. Were there any directors in between Efram</p> <p>7 Karsh and Mr. Roman?</p> <p>8 A. See, the titles sometimes don't correspond</p> <p>9 with the activities. Amy Shargel, I think, had had the</p> <p>10 title of director, I'm not sure. And shortly</p> <p>11 thereafter, Gregg came.</p> <p>12 Q. Do you know why --</p> <p>13 A. I don't know --</p> <p>14 Q. I'm sorry. Do you know why Amy Shargel's</p> <p>15 employment with Middle East Forum ended?</p> <p>16 A. I do not. I may have given legal advice on</p> <p>17 the matter.</p> <p>18 Q. Was there, like, a reason for termination</p> <p>19 that was provided to her that you're aware of? Was she</p> <p>20 terminated, I guess is a better question.</p> <p>21 A. I am not involved in any way in management,</p> <p>22 administration or anything related to that unless there</p> <p>23 is a legal issue that's elevated to me and then I</p> <p>24 give -- either give advice or hire out the contract or I</p> <p>25 secure outside counsel. So in terms of all these</p>
<p style="text-align: right;">Page 9</p> <p>1 sorry.</p> <p>2 THE WITNESS: Karsh.</p> <p>3 BY MR. CARSON:</p> <p>4 Q. Karsh?</p> <p>5 A. Yep.</p> <p>6 THE COURT REPORTER: Wait. I'm sorry.</p> <p>7 I still didn't get the name. Say it again.</p> <p>8 THE WITNESS: I'm going to try and spell</p> <p>9 it, although I'm a poor speller despite the fact that</p> <p>10 I'm chief editor. K-A-R -- is it S-H or is there a C in</p> <p>11 there? I think it's just K-A-R-S-H.</p> <p>12 MR. CARSON: That's how I spelled it.</p> <p>13 THE COURT REPORTER: What was the first</p> <p>14 name?</p> <p>15 THE WITNESS: Efram, it's an Israeli</p> <p>16 name.</p> <p>17 THE COURT REPORTER: Okay. Thank you.</p> <p>18 MR. CARSON: I spelled it F-R-Y-A-M. I</p> <p>19 don't know if I got it close.</p> <p>20 THE WITNESS: It's E-P-H.</p> <p>21 MR. CAVALIER: I think it's</p> <p>22 E-P-H-R-A-I-M.</p> <p>23 THE WITNESS: That would be it.</p> <p>24 BY MR. CARSON:</p> <p>25 Q. Okay. And Efram Karsh was the director of</p>	<p style="text-align: right;">Page 11</p> <p>1 management person -- the answer to that is, I may have</p> <p>2 given legal advice and I actually don't remember.</p> <p>3 Q. Okay. Amy Shargel was the director before --</p> <p>4 directly before Mr. Roman?</p> <p>5 MR. CAVALIER: Object to form.</p> <p>6 THE WITNESS: Again, I am not sure if</p> <p>7 she had the title; I think she did. Maybe it was</p> <p>8 managing director. Again, I'm not -- I'm not an expert</p> <p>9 in all these different titles and comings and goings.</p> <p>10 BY MR. CARSON:</p> <p>11 Q. Is it fair to say that Mr. Roman began his</p> <p>12 employment around the same time when Amy Shargel's</p> <p>13 employment ended?</p> <p>14 A. To the best of my knowledge, there was some</p> <p>15 overlap.</p> <p>16 Q. And when Mr. Roman began his employment with</p> <p>17 Middle East Forum, what was his position?</p> <p>18 A. Director.</p> <p>19 Q. And were you involved in the hiring process?</p> <p>20 A. Nope. I may have interviewed, but in the</p> <p>21 same respect that any other, like, senior member of any</p> <p>22 organization would interview people and then the boss</p> <p>23 would ask for your advice, you know, what do you think</p> <p>24 of this guy. But no, I was not involved in the hiring</p> <p>25 process except for possibly interviewing.</p>

<p>1 Q. Do you know when his employment -- Mr. 2 Roman's employment began with Middle East Forum? 3 A. I'm not very good with days. 4 Q. Ballpark. 5 A. I don't remember -- I'm really sorry. I 6 don't remember, honestly. I don't remember. Maybe it 7 was, like, two or three years after I started, four 8 years. 9 Q. I think it says on LinkedIn -- 10 A. It's all a blur; it's a blur to me. 11 Q. That's fair. I believe on LinkedIn, it says 12 he started around 2015. Does that sound right? 13 A. That sounds right, yep. 14 Q. Okay. The year that he started, are you 15 aware of any allegations of sexual harassment that were 16 presented by any employees in 2015? 17 MR. CAVALIER: I'm going to object to 18 the form and I'm also going to give the witness an 19 instruction now, as always during this deposition, to 20 answer only to the extent you can answer without 21 divulging any attorney-client confidences. 22 THE WITNESS: Everything I've learned 23 about alleged allegations I've learned through my legal 24 representation. I'm really not involved in any other 25 way.</p>	<p>Page 12</p> <p>1 that. 2 BY MR. CARSON: 3 Q. I'm not asking you to divulge legal advice. 4 I'm asking, do you know whether they maintain a 5 policy -- 6 A. Wasn't involved with it, wasn't really 7 involved with it any other way. 8 Q. Do you know whether the Middle East Forum has 9 a policy to prevent discrimination and harassment in the 10 workplace? Yes or no; do they have a policy? 11 A. I may have -- I may have given legal advice 12 on that. I'm not -- again, I'm not in management or 13 personnel. 14 Q. I'm not asking whether you've given legal 15 advice. I'm just asking you a simple yes-or-no 16 question. I'm not asking you to talk about any 17 communications, I'm just asking if you know whether or 18 not there's a policy. 19 A. I'll repeat my answer. I may have given 20 legal advice on a sexual harassment policy. That's -- I 21 may have given legal advice on a sexual harassment 22 policy. That's the extent of my knowledge. 23 Q. Did you give legal advice on the sexual 24 harassment policy? 25 A. I can't remember a hundred percent. I may</p> <p>Page 14</p>
<p>Page 13</p> <p>1 BY MR. CARSON: 2 Q. Well, if someone reported sexual harassment 3 at the Middle East Forum and they followed -- strike 4 that. 5 Is there a policy for reporting sexual 6 harassment at the Middle East Forum? 7 A. I'm not involved with that, but my guess is 8 that the -- there is a personnel director and it would 9 go through them. Sorry. 10 Q. Who was the personnel director in 2015? 11 A. We're going with dates again. To the best of 12 my knowledge -- again, I don't -- I don't even work in 13 the office, I work remote, so I'm not real familiar with 14 all the procedures and goings-on. But to the best of my 15 knowledge, Marnie Meyer was the personnel director. I 16 don't remember when she started. I do not remember when 17 she started; I don't. Somewhere around that time, 2015, 18 2016. 19 Q. Yeah. Yeah. So what is your knowledge with 20 regard to the Middle East Forum's policy to prevent 21 discrimination and harassment in the workplace? Do they 22 have a policy? 23 MR. CAVALIER: Same objection, same 24 instruction. 25 THE WITNESS: I gave legal advice on</p>	<p>Page 15</p> <p>1 have. I do a lot of different things. I may have. 2 It's probably something else that predated me, but I may 3 have. 4 Q. Before you started working there, did they 5 have a policy to prevent sexual harassment? 6 A. I don't know, I wasn't working there. 7 Q. But, like, when you started, were you 8 notified about a policy? 9 A. I don't remember. 10 Q. Did you ever receive an employee handbook? 11 A. I must have. 12 Q. Was there a policy to prevent discrimination 13 and harassment in the workplace? 14 A. I don't remember. I don't remember. 15 Q. Were you asked to acknowledge receipt of the 16 employee handbook? 17 A. Don't remember. 18 Q. Do you remember whether you actually did 19 acknowledge receipt of the employee handbook? 20 A. No, I don't remember. 21 Q. Do you know whether or not the Middle East 22 Forum today has a policy to prevent discrimination and 23 harassment in the workplace? 24 A. I do not -- I'm not -- again, not in 25 personnel, not in management, so -- I only give legal</p>



<p>1 advice.</p> <p>2 Q. But you're an employee of the Middle East</p> <p>3 Forum, correct?</p> <p>4 A. Yes.</p> <p>5 Q. Are you a W-2 employee?</p> <p>6 A. Yes.</p> <p>7 Q. How many employees does the Middle East Forum</p> <p>8 have?</p> <p>9 A. I'm not sure.</p> <p>10 Q. Can you estimate?</p> <p>11 A. I really don't know. Fifteen, 20. I don't</p> <p>12 know. I don't know. It changes. I don't know.</p> <p>13 Q. How many employees work in the Philadelphia</p> <p>14 office today?</p> <p>15 A. I don't know. I'm not -- I've never worked</p> <p>16 in the office. I may visit the office two or three</p> <p>17 times a year for maybe an hour or two each time.</p> <p>18 Q. Where do you work from?</p> <p>19 A. I work from my home office.</p> <p>20 Q. Where is that?</p> <p>21 A. Cherry Hill, New Jersey.</p> <p>22 Q. Do you know whether or not the Middle East</p> <p>23 Forum holds trainings to train their employees in</p> <p>24 connection with how to report discrimination and</p> <p>25 harassment in the workplace?</p>	<p>Page 16</p> <p>1 without divulging legal confidences or any</p> <p>2 attorney-client communications, you can answer.</p> <p>3 THE WITNESS: I cannot -- I mean, I'll</p> <p>4 try and make it easier for you. Every single thing in</p> <p>5 that regard is, I just gave legal advice. I wasn't</p> <p>6 involved. Wasn't in the office.</p> <p>7 BY MR. CARSON:</p> <p>8 Q. Well, you didn't give legal advice -- you</p> <p>9 became Ms. Barbounis's manager, correct, after she</p> <p>10 reported discrimination and harassment in the workplace?</p> <p>11 MR. CAVALIER: Object to form. You can</p> <p>12 answer.</p> <p>13 THE WITNESS: Yeah, absolutely not. No.</p> <p>14 BY MR. CARSON:</p> <p>15 Q. You didn't send an e-mail to my client and</p> <p>16 tell her that you were going to be her manager at that</p> <p>17 point?</p> <p>18 A. No. But I could help you clear up the</p> <p>19 confusion.</p> <p>20 Q. Sure.</p> <p>21 A. In the summer of 2019 for a number of weeks,</p> <p>22 I supervised the weekly tasks of administrative</p> <p>23 employees. That was only for a few weeks in the summer</p> <p>24 of 2019. I had no authority over them and my -- the</p> <p>25 extent of that supervision was that they would send me a</p>
<p>1 A. No, I --</p> <p>2 THE COURT REPORTER: I'm sorry. Mr. --</p> <p>3 I missed the end of that question.</p> <p>4 BY MR. CARSON:</p> <p>5 Q. I said, do you know whether the Middle East</p> <p>6 Forum trains their employees on how to report</p> <p>7 discrimination and harassment in the workplace?</p> <p>8 A. I don't know. I don't know.</p> <p>9 Q. Have you ever been trained on how to report</p> <p>10 discrimination and harassment in the workplace?</p> <p>11 A. I don't recall.</p> <p>12 Q. Do you know whether or not employees are</p> <p>13 provided with opportunities on any kind of interim basis</p> <p>14 to report discrimination and harassment in the</p> <p>15 workplace?</p> <p>16 A. I'm not in a place to know.</p> <p>17 Q. But -- so in your employment, have you ever</p> <p>18 been provided with an opportunity to report --</p> <p>19 A. I may have. I may have gotten a notice for a</p> <p>20 meeting. I may have not seen it. I may have</p> <p>21 disregarded it. I don't remember. I don't remember.</p> <p>22 Q. Do you remember whether Lisa Barbounis ever</p> <p>23 reported discrimination and harassment in the workplace?</p> <p>24 MR. CAVALIER: Objection to form. Same</p> <p>25 instruction as earlier. To the extent you can answer</p>	<p>Page 17</p> <p>1 weekly report via e-mail and I would thank them for it.</p> <p>2 I do not believe I have ever even spoke with any of them</p> <p>3 or did anything else.</p> <p>4 Q. But you did send them an e-mail telling them</p> <p>5 that you were going to be managing their work from here</p> <p>6 on out?</p> <p>7 A. I have no recollection of that, no. I do not</p> <p>8 believe I did, no. If you want to show me something,</p> <p>9 I'd be happy to look at it. But I do not remember</p> <p>10 sending them an e -- the only e-mails I sent was, thank</p> <p>11 you for sending me your weekly report. Or sometimes I</p> <p>12 may have a question, did you do this or do that or you</p> <p>13 forgot to send me your weekly report, would you please</p> <p>14 send me your weekly report.</p> <p>15 Q. Did you ever investigate any discrimination</p> <p>16 or harassment in the workplace during your employment?</p> <p>17 A. Absolutely not. Nope.</p> <p>18 Q. You never performed any kind of</p> <p>19 investigation?</p> <p>20 A. None.</p> <p>21 Q. You never took any witness statements?</p> <p>22 A. Nope.</p> <p>23 Q. You never interviewed Gregg Roman?</p> <p>24 A. Nope. I may have given Gregg Roman legal</p> <p>25 advice.</p>
	<p>Page 18</p> <p>Page 19</p>



<p>Page 20</p> <p>1 Q. So just to be sure, during your employment 2 with the Middle East Forum from the beginning of Gregg 3 Roman's employment until today, you've never taken any 4 investigative measures -- 5 A. No. 6 Q. -- actually with a report of discrimination 7 or harassment in the workplace -- 8 A. No. 9 Q. -- involving Gregg Roman? 10 A. Never. Nope. 11 Q. So to your knowledge, whose job was it to 12 investigate reports of discrimination and harassment in 13 the workplace? 14 A. I'm not in a position to know. But to help 15 you, I would assume that it goes to the personnel 16 manager. 17 Q. Marnie Meyer, at the time? 18 A. Yep. 19 Q. And if not Marnie Meyer, Daniel Pipes? 20 A. Yeah, I would assume. 21 Q. Are the reasons you would assume it's Daniel 22 Pipes is because he's the president of the organization? 23 A. Yep. 24 Q. And he's the only person in a position to 25 investigate Gregg Roman, correct?</p>	<p>Page 22</p> <p>1 talking at the same time. I apologize. 2 MR. CARSON: Yeah. So if you guys have 3 some sort of message code where you said every time he 4 puts the objection, you're supposed to say that -- 5 MR. CAVALIER: Seth, that's not going to 6 work. 7 MR. CARSON: -- that's not okay. 8 MR. CAVALIER: We're not going to 9 tolerate it. 10 MR. CARSON: That's the second time 11 where he started to answer a question, you put the 12 objection in and then he changed his answer. 13 MR. CAVALIER: The witness is giving you 14 honest answers and I'm lodging valid objections. 15 MR. CARSON: No, you're not. 16 MR. CAVALIER: Don't imply that I'm 17 somehow violating the rules of this deposition. You did 18 that earlier with Dave and it backfired in your face. 19 Don't try it with me. Ask the question. 20 MR. CARSON: It didn't backfire. 21 THE WITNESS: I declare it. I have no 22 idea what you're talking about. 23 MR. CARSON: There wasn't a single 24 objection that was entered after the call with Mr. 25 Wolson. It worked perfectly, actually. So you might</p>
<p>Page 21</p> <p>1 MR. CAVALIER: Object to form. 2 THE WITNESS: I have to say, I'm sure 3 that he would be spearheading it, but I don't know what 4 he would do. You'd have to ask him. But yeah, I would 5 assume he's the president, so he would be spearheading 6 it, yes. 7 BY MR. CARSON: 8 Q. Did the Middle East Forum, to your knowledge, 9 hold a meeting on November 5th, 2018 due to reports of 10 discrimination and harassment in the workplace involving 11 Gregg Roman? 12 A. Yes, I do remember that meeting. 13 Q. Were you present at that meeting? 14 A. I was present, yes. 15 Q. Was Gregg Roman invited to that meeting? 16 MR. CAVALIER: Marc, before you answer, 17 I'm going to lodge the same objection, give you the same 18 instruction with respect to attorney-client 19 communications or confidences. 20 THE WITNESS: I gave legal advice on 21 that. 22 MR. CARSON: Yeah, every time you say -- 23 every time you place an objection and Mr. Fink provides 24 the same answer afterwards. So if you guys -- 25 THE WITNESS: That is the -- we're</p>	<p>Page 23</p> <p>1 want to check your definition of backfire. 2 MR. CAVALIER: Well, regardless, I'm not 3 going to sit here and have you make veiled threats in 4 references to motions -- 5 MR. CARSON: It's not a veiled threat. 6 I'm suggesting that every time that you put the 7 objection in, the answer changes. So just -- 8 MR. CAVALIER: Oh, your suggestion is -- 9 THE WITNESS: I was going to -- I don't 10 understand what the -- what the issue is, Seth. I gave 11 legal advice. 12 BY MR. CARSON: 13 Q. I'm asking you whether or not you know 14 whether Mr. Roman was invited to attend the November 15 5th, 2018 meeting. 16 MR. CAVALIER: Same objection, same 17 instruction. Subject to that, to the extent you can, 18 you can answer. 19 THE WITNESS: I gave legal advice on 20 that. 21 BY MR. CARSON: 22 Q. I'm not asking you about legal advice, I'm 23 asking -- 24 A. There's an issue and I gave legal advice on 25 that issue.</p>

<p>Page 24</p> <p>1 Q. I'm not asking you what your legal advice 2 was. I'm asking if you know whether he was invited to 3 it or not.</p> <p>4 A. I refer you to my pervious answer.</p> <p>5 Q. Yeah, but -- so what legal advice are you 6 referring to? You gave legal advice in connection with 7 him coming to the meeting?</p> <p>8 MR. CAVALIER: Objection and I'm going 9 to instruct you specifically not to answer that 10 question.</p> <p>11 MR. CARSON: I'm asking questions 12 about -- I'm going to find out what this objection and 13 this refusal to answer the question is based on, so --</p> <p>14 MR. CAVALIER: It's based on the fact 15 that his awareness of the subject of the answer is part 16 of the legal advice he rendered on the issue that he 17 identified for you. I'm instructing him not to answer 18 the question.</p> <p>19 BY MR. CARSON:</p> <p>20 Q. How were you aware that Mr. Roman was going 21 to come to a meeting?</p> <p>22 MR. CAVALIER: Let me finish. If you're 23 going to ask a question, let me finish responding to 24 you. To the extent you just asked him what the legal 25 advice was that he provided, he's certainly not going to</p>	<p>Page 26</p> <p>1 A. I don't remember. You can show me the memo, 2 I'd be happy to look at it.</p> <p>3 Q. Do you remember receiving a memo?</p> <p>4 A. I don't.</p> <p>5 Q. So how did you find out about the meeting?</p> <p>6 MR. CAVALIER: Same objection, same 7 instruction.</p> <p>8 THE WITNESS: Yeah.</p> <p>9 BY MR. CARSON:</p> <p>10 Q. There he goes again. About to answer and 11 then he changes his answer.</p> <p>12 A. I was going to -- okay. I'll make it easy 13 for you, Seth. My answer was going to be, I gave legal 14 advice.</p> <p>15 Q. No, it wasn't.</p> <p>16 A. No. No. No. It was. I was giving legal 17 advice hour after hour after hour. That's all I was 18 doing.</p> <p>19 Q. How did you become aware that there was going 20 to be a meeting on that day?</p> <p>21 A. The same answer. I was giving legal advice.</p> <p>22 Q. You became aware when you were giving advice?</p> <p>23 A. I gave legal advice on that matter.</p> <p>24 Q. And you became aware of the meeting while you 25 were --</p>
<p>Page 25</p> <p>1 answer that.</p> <p>2 MR. CARSON: That isn't what I asked 3 him.</p> <p>4 MR. CAVALIER: That's exactly what you 5 asked him. If you want to ask him a different question, 6 you can go ahead.</p> <p>7 MR. CARSON: That's not what I asked.</p> <p>8 BY MR. CARSON:</p> <p>9 Q. Why -- how did you become aware that Mr. 10 Roman was invited to the meeting?</p> <p>11 MR. CAVALIER: Objection. Same 12 instructions. To the extent you can answer subject to 13 that instruction, you can answer.</p> <p>14 BY MR. CARSON:</p> <p>15 A. You didn't become aware due to legal advice, 16 correct? You became aware because it was in a memo that 17 you were on, correct?</p> <p>18 MR. CAVALIER: Same objection. Same 19 instructions.</p> <p>20 BY MR. CARSON:</p> <p>21 Q. Right?</p> <p>22 A. I can't answer the question.</p> <p>23 Q. Were you or were you not included in a memo 24 that went out to the entire office informing them about 25 the meeting?</p>	<p>Page 27</p> <p>1 A. If you want to show me a memo, I'd be happy 2 to look at it.</p> <p>3 Q. I'll show it to you. You are on this memo, 4 correct?</p> <p>5 A. Yep, looks like it.</p> <p>6 Q. Well, isn't that how you became aware of the 7 meeting?</p> <p>8 MR. CAVALIER: I'm going to object. To 9 the extent you want him to answer questions about this 10 document, Seth, as I've told you before, you've got to 11 show him the document and let him read it.</p> <p>12 MR. CARSON: He's looking at it.</p> <p>13 MR. CAVALIER: He's looking at a header 14 and a block of e-mail addresses. He can't --</p> <p>15 MR. CARSON: He can tell me to scroll 16 around.</p> <p>17 BY MR. CARSON:</p> <p>18 Q. Isn't this how you became aware of the 19 meeting?</p> <p>20 A. Not necessarily. And again, it goes to me 21 giving legal advice.</p> <p>22 Q. Did you receive this memo?</p> <p>23 A. It appears so, yes.</p> <p>24 Q. Gregg Roman was invited to the meeting, 25 correct?</p>

<p>1 MR. CAVALIER: Object to form. Object 2 on the same basis as I did earlier. To the extent you 3 can answer without giving away attorney-client 4 confidences, you can answer. 5 THE WITNESS: Yeah, looking at the memo 6 on the screen, assuming that it's correct, which I have 7 no doubt -- no doubt that it's not correct, yes. 8 BY MR. CARSON: 9 Q. Do you think that's appropriate, that he was 10 invited? 11 MR. CAVALIER: Same objection, same 12 instruction. 13 BY MR. CARSON: 14 Q. I'm not asking you to divulge any 15 confidences. 16 A. That gets into legal advice. 17 Q. Do you think it's appropriate for the 18 harasser to be invited to the meeting to discuss -- 19 MR. CAVALIER: Objection to form. 20 THE WITNESS: Legal advice. 21 MR. CAVALIER: Object to form. Object 22 to lack of foundation. And to the extent you can answer 23 without divulging -- 24 BY MR. CARSON: 25 Q. Mr. Roman was the alleged harasser when</p>	<p>Page 28</p> <p>1 A. There were a lot of grievances against Gregg 2 at that meeting. That's what I remember. 3 Q. Sexual harassment was one of them? 4 A. I don't remember because there were more 5 grievances that seemed to be -- people felt more strong 6 about, that he was a really -- difficult to work with, 7 et cetera, et cetera, et cetera. 8 Q. I'm just asking about sexual harassment in 9 the meeting. 10 A. I vaguely remember. 11 Q. You vaguely remember whether there was sexual 12 harassment discussed at a meeting held to discuss sexual 13 harassment? 14 MR. CAVALIER: Object to form, object to 15 lack of foundation and object to the mischaracterization 16 of the prior question and testimony. 17 THE WITNESS: I do not remember the 18 details of that meeting. It was not a seminal event in 19 my life. 20 BY MR. CARSON: 21 Q. It was a seminal event in Mr. Roman's life, 22 correct? 23 A. Okay. So ask him. 24 Q. Mr. Roman lies about it, too. 25 MR. CAVALIER: I'm going to object to</p> <p>Page 30</p>
<p>1 this -- 2 MR. CAVALIER: Seth, let me lodge my 3 objections. You're not going step all over me during 4 this deposition. 5 BY MR. CARSON: 6 Q. Mr. Roman was the alleged harasser, correct, 7 when this memo came out? 8 MR. CAVALIER: I'm going to object to 9 form. You can answer that to the extent possible. 10 THE WITNESS: Repeat your question. 11 BY MR. CARSON: 12 Q. Mr. Roman was the alleged harasser when this 13 memo was sent, correct? 14 A. Again, I'm going to assert privilege myself. 15 This is -- all has to do with legal advice I was giving 16 at the time. 17 Q. My question doesn't. 18 A. If you want to ask me about something that 19 happened in the meeting, I probably don't remember, but 20 I'd be happy to answer you. 21 Q. Was it alleged at the meeting that Mr. Roman 22 sexually harassed three women? 23 A. I'm sorry. Repeat that. 24 Q. Were there allegations discussed at the 25 meeting of sexual harassment?</p> <p>Page 29</p>	<p>1 that gratuitous and incorrect statement on the record, 2 for whatever that's worth. I guess there's no question 3 pending, though, so there's nothing else to object to. 4 BY MR. CARSON: 5 Q. Mr. Roman testified that he didn't know about 6 the meeting either, correct? 7 MR. CAVALIER: Object to form, object to 8 lack of foundation. You can answer to the extent you 9 can, again, without divulging any attorney-client 10 confidences. 11 BY MR. CARSON: 12 Q. Was there a meeting held to discuss how to 13 avoid questions with regard to the deposition today? 14 MR. CAVALIER: I'll just object to the 15 implication there. But you can answer that as long as 16 you don't talk about anything that you and I talked 17 about. 18 THE WITNESS: Absolutely not. 19 BY MR. CARSON: 20 Q. So you think that the allegations of sexual 21 harassment were the least important allegations 22 discussed at that meeting; is that your testimony? 23 MR. CAVALIER: Object to form. Object 24 to the mischaracterization of prior testimony. 25 THE WITNESS: Ask me a straight</p> <p>Page 31</p>

<p>1 question, I'll answer you. I don't understand.  2 BY MR. CARSON:  3 Q. Answer the question I asked you.  4 MR. CAVALIER: Same objection.  5 BY MR. CARSON:  6 Q. Is it your testimony that the least important  7 allegations raised at that meeting were allegations of  8 sexual harassment?  9 A. Yeah. Yeah, that's my memory. Yes. Yes.  10 Yeah. Yeah.  11 Q. So why was that meeting called?  12 A. That goes to legal advice.  13 Q. Well, what's your understanding of why it was  14 called?  15 MR. CAVALIER: Same --  16 THE WITNESS: That goes to legal advice.  17 BY MR. CARSON:  18 Q. I'm not asking about any advice that you  19 gave. I'm not asking about any advice that anyone else  20 gave. When Daniel Pipes sent the memo, what was your  21 understanding about the meeting?  22 MR. CAVALIER: Same objection, same  23 instruction.  24 THE WITNESS: I cannot answer that  25 without divulging advice I gave to the Middle East</p>	<p>Page 32</p> <p>1 Q. Do you know whether anyone ever investigated  2 allegations that Mr. Roman maintained a sexual  3 relationship with Ms. Merville?  4 A. I don't even know who she is, so the answer's  5 no.  6 Q. Is that something that Middle East Forum  7 should have done?  8 MR. CAVALIER: Object to form. I'm  9 going to give instruction again. To the extent you can  10 answer that without divulging attorney-client  11 confidences, you can try to answer.  12 THE WITNESS: Again, I could -- I'm  13 telling you, I never even heard of her and I have no  14 idea.  15 BY MR. CARSON:  16 Q. Do you think that the Middle East Forum is  17 obligated to investigate every allegation of sexual  18 harassment presented?  19 MR. CAVALIER: Object to form. Same  20 instruction with respect to the privilege. To the  21 extent you can answer without disclosing any privileged  22 information, you can answer.  23 THE WITNESS: I think that every  24 organization should definitely investigate any  25 allegations of sexual harassment coming from an</p> <p>Page 34</p>
<p>1 Forum.  2 Q. Yeah, you can.  3 MR. CAVALIER: No, he can't. He just  4 told you he can't. He's not going to.  5 THE WITNESS: I did my best to describe  6 what went on in the meeting. I really don't remember  7 too much. That's about as much as I could do.  8 BY MR. CARSON:  9 Q. Did you ever to talk to my clients about  10 sexual harassment?  11 A. To the best of my knowledge, no. I have  12 barely ever spoken with your clients at all.  13 Q. Did you ever talk to Lisa Barbounis about  14 sexual harassment?  15 A. Not to my knowledge, no.  16 Q. Patricia McNulty?  17 A. Not to my knowledge, no.  18 Q. Gabrielle Bloom?  19 A. I don't even know who that is.  20 Q. Do you know why she was given money?  21 A. I don't even know who that is. No idea.  22 Seth, I hear the name in depositions. No idea who that  23 is.  24 Q. Do you know who Leah Merville is?  25 A. No idea.</p> <p>Page 33</p>	<p>1 employee, yes.  2 BY MR. CARSON:  3 Q. Only coming from employees?  4 A. Yeah.  5 Q. So if customers allege sexual harassment --  6 A. Well, that could -- well, that's another  7 legal issue, but definitely employees.  8 Q. Well, isn't it the same issue?  9 A. I don't know what you're talking about. Who  10 are we talking about?  11 Q. I'm talking in general with regard to MEF's  12 policy to prevent discrimination and harassment --  13 A. We don't have customers, we're not a retail  14 store.  15 MR. CAVALIER: I'm going to object to  16 the lack of foundation and the reference back to the  17 fact that you now say you were talking about MEF's  18 policies when the question was general in nature to  19 begin. Subject to that objection --  20 THE WITNESS: I don't know what MEF's  21 policy -- you said this is a general should an  22 organization. That was what I was -- to be clear of the  23 record, I was answering should any organization.  24 BY MR. CARSON:  25 Q. Yeah, repeat the same thing your lawyer just</p> <p>Page 35</p>



<p>1 said. Go ahead. Go ahead.</p> <p>2 A. What's that?</p> <p>3 Q. Go ahead and repeat what your lawyer just</p> <p>4 said. Go ahead, I'll let you do it. Go ahead.</p> <p>5 A. I don't understand what you just said.</p> <p>6 Q. I know you don't.</p> <p>7 MR. CAVALIER: He's trying to be a</p> <p>8 smartass.</p> <p>9 MR. CARSON: No, what you're doing</p> <p>10 obstructing the deposition is inappropriate.</p> <p>11 THE WITNESS: Well, for the record, I</p> <p>12 mean, I'm trying to be as straight as possible and get</p> <p>13 through this for all of us. I'm not trying to play any</p> <p>14 games. So I'm taking you at your -- at you being</p> <p>15 straight.</p> <p>16 BY MR. CARSON:</p> <p>17 Q. Right. And so then it's your testimony today</p> <p>18 that the November 5th, 2018 meeting was not called in</p> <p>19 connection to allegations of sexual harassment?</p> <p>20 A. I did not answer that question because it</p> <p>21 went into legal advice.</p> <p>22 Q. Well, based on being there, was it called for</p> <p>23 that?</p> <p>24 MR. CAVALIER: Same objection.</p> <p>25 THE WITNESS: I'm happy to repeat the</p>	<p>Page 36</p> <p>1 I'm repeating my same answer.</p> <p>2 Q. We're --</p> <p>3 THE COURT REPORTER: I'm sorry. What</p> <p>4 did you say, Mr. Carson.</p> <p>5 BY MR. CARSON:</p> <p>6 Q. We're going to discuss it for as long as it</p> <p>7 takes. If it takes two hours, it will take two hours.</p> <p>8 A. I refer you to my previous answer or you</p> <p>9 could ask it again.</p> <p>10 Q. I'll ask the question. Based on your being</p> <p>11 present, what was the most serious allegation alleged in</p> <p>12 connection to Gregg Roman's conduct?</p> <p>13 MR. CAVALIER: Object to form.</p> <p>14 THE WITNESS: I'll answer it again.</p> <p>15 That he was a hard boss.</p> <p>16 BY MR. CARSON:</p> <p>17 Q. So it wasn't alleged -- was it alleged at the</p> <p>18 meeting that he put hands on Patricia McNulty?</p> <p>19 A. I don't remember.</p> <p>20 Q. Well, wouldn't that be more serious than him</p> <p>21 being a hard boss?</p> <p>22 MR. CAVALIER: Object to the form and</p> <p>23 the use of the word "serious."</p> <p>24 BY MR. CARSON:</p> <p>25 Q. Significant.</p> <p>Page 38</p>
<p>1 answer I gave previously. From what I --</p> <p>2 BY MR. CARSON:</p> <p>3 Q. You were present at the November 5th, 2018</p> <p>4 meeting, right?</p> <p>5 A. Yes.</p> <p>6 Q. So based on being there, was that meeting</p> <p>7 called to discuss allegations of sexual harassment?</p> <p>8 A. I cannot get into why it was called. Sitting</p> <p>9 there -- and I don't remember a lot, but sexual</p> <p>10 harassment was definitely not the biggest issue in that</p> <p>11 meeting. It was a rant session about what a hard boss</p> <p>12 Gregg Roman -- Gregg Roman was.</p> <p>13 Q. What was the most serious issue discussed at</p> <p>14 that meeting?</p> <p>15 A. I don't remember.</p> <p>16 Q. Wasn't it allegations that he sexually</p> <p>17 assaulted two employees?</p> <p>18 A. I just said it wasn't.</p> <p>19 Q. Why are you saying that it wasn't, because</p> <p>20 they didn't focus on that the entire time?</p> <p>21 A. It was --</p> <p>22 MR. CAVALIER: Object to form.</p> <p>23 THE WITNESS: I'm repeating the same</p> <p>24 answer. I mean, if you want to talk about it for two</p> <p>25 hours, I guess we could talk about it for two hours, but</p> <p>Page 37</p>	<p>1 A. You're asking my impression -- go ahead.</p> <p>2 You're asking my impression of a meeting two-and-half</p> <p>3 years ago -- three or two years ago, whatever. You're</p> <p>4 asking my impression. That's -- I'm giving you my</p> <p>5 impression. You could ask it a hundred different ways.</p> <p>6 Q. So you think that if someone talks about</p> <p>7 their supervisor putting hands on them in a sexually</p> <p>8 inappropriate way and then another somebody talks about</p> <p>9 someone being a hard boss, it's more significant or</p> <p>10 concerning that --</p> <p>11 A. I do not remember --</p> <p>12 MR. CAVALIER: Object to form.</p> <p>13 THE COURT REPORTER: Gentlemen, I can't</p> <p>14 do this.</p> <p>15 MR. CAVALIER: Marc -- Marc -- Marc, let</p> <p>16 him finish the question and let me -- again, give me</p> <p>17 time to object.</p> <p>18 THE WITNESS: Okay. I'm sorry.</p> <p>19 MR. CARSON: Yeah, he has to tell you</p> <p>20 how to answer.</p> <p>21 MR. CAVALIER: Seth, I've got to tell</p> <p>22 you, you do that one more time and we're done with this</p> <p>23 deposition.</p> <p>24 MR. CARSON: No, we're not.</p> <p>25 MR. CAVALIER: Watch it happen.</p> <p>Page 39</p>

<p>Page 40</p> <p>1 MR. CARSON: It's not going to happen.</p> <p>2 MR. CAVALIER: Do it again and we'll</p> <p>3 see.</p> <p>4 MR. CARSON: I'll do it -- as many times</p> <p>5 as you tell how to answer is as many times as I'll do</p> <p>6 it.</p> <p>7 BY MR. CARSON:</p> <p>8 Q. Do you see this e-mail right here?</p> <p>9 A. Scroll up. Scroll up -- scroll up to the</p> <p>10 top.</p> <p>11 Q. The first e-mail we looked at --</p> <p>12 MR. CAVALIER: Seth, are you going to</p> <p>13 let him see the document or not?</p> <p>14 MR. CARSON: The first e-mail that we</p> <p>15 looked at will be Fink-1 and it's going to be D -- hold</p> <p>16 on -- and it's going to be D13 -- it's going to be D13.</p> <p>17 So Fink-1 is D13, okay? Fink 2 is going to be D2, okay?</p> <p>18 (Exhibits Fink-1 and Find-2 were marked</p> <p>19 for identification.)</p> <p>20 BY MR. CARSON:</p> <p>21 Q. Now, where do you want me to scroll?</p> <p>22 A. I don't know. What do you want to show me,</p> <p>23 this e-mail right here? Okay. Stop right there. Is</p> <p>24 this what you want to show me?</p> <p>25 Q. Marked Fink-2 and it's Bates-stamped D2.</p>	<p>Page 42</p> <p>1 THE WITNESS: What's the question?</p> <p>2 Seth, I'm trying to be straight with you. I'm not</p> <p>3 trying to play games or grandstand. What's the</p> <p>4 question?</p> <p>5 BY MR. CARSON:</p> <p>6 Q. My question is, do you have any specific</p> <p>7 reasons to remember an e-mail sent by Patrician McNulty</p> <p>8 on 11-4-2018 which he copied to you?</p> <p>9 A. I do not remember that e-mail, no. But I see</p> <p>10 I'm on -- I don't dispute that I had it, I don't dispute</p> <p>11 that I read it.</p> <p>12 Q. Well, do you think this -- go ahead.</p> <p>13 A. Nothing else.</p> <p>14 Q. Do you think Ms. McNulty remembers sending</p> <p>15 this e-mail?</p> <p>16 MR. CAVALIER: Object to form.</p> <p>17 BY MR. CARSON:</p> <p>18 Q. Is that funny?</p> <p>19 A. Yeah. I don't even know her. How am I</p> <p>20 supposed to know if she remembers? Ask her. Why are</p> <p>21 you asking me?</p> <p>22 Q. Well, it's an e-mail where she alleged that</p> <p>23 Gregg Roman, her boss, put his hands on her in a</p> <p>24 sexually inappropriate way.</p> <p>25 A. So what's the question?</p>
<p>Page 41</p> <p>1 A. Okay. So what do you want to ask me about</p> <p>2 it?</p> <p>3 Q. You were on this e-mail, correct?</p> <p>4 A. I see that I was copied, I do not remember</p> <p>5 the e-mail.</p> <p>6 Q. You received it, though, correct?</p> <p>7 A. If that's correct, I did. I do not have any</p> <p>8 memory of it.</p> <p>9 Q. Well, I'm showing you a document that was</p> <p>10 produced.</p> <p>11 A. Okay. I'm not disputing it -- I'm not</p> <p>12 necessarily disputing it. I just said, I don't remember</p> <p>13 it. I get hundreds of e-mails a day.</p> <p>14 Q. This was just another e-mail you got,</p> <p>15 correct?</p> <p>16 A. I got thousands of e-mails with this matter.</p> <p>17 Q. Yeah, and this is just another one that you</p> <p>18 had to deal with, correct?</p> <p>19 MR. CAVALIER: Object to form.</p> <p>20 BY MR. CARSON:</p> <p>21 Q. No reason to remember it, right?</p> <p>22 A. So what's the question?</p> <p>23 Q. Do you have any reason to remember this</p> <p>24 e-mail?</p> <p>25 MR. CAVALIER: Object to form.</p>	<p>Page 43</p> <p>1 Q. So chances are, she remembers it, right?</p> <p>2 MR. CAVALIER: Object to the foam.</p> <p>3 THE WITNESS: I have no idea if she</p> <p>4 remembers it.</p> <p>5 BY MR. CARSON:</p> <p>6 Q. "Dear Daniel: On November 1st, I confirmed</p> <p>7 with you that I was aware of certain indiscretions</p> <p>8 between Lisa Barbounis and Gregg Roman during a trip to</p> <p>9 Israel in May. While the two were in Israel, Lisa and I</p> <p>10 had a conversation via text and call where she expressed</p> <p>11 Gregg was inappropriate toward her and had also informed</p> <p>12 her of his previous indiscretions with MEF intern Leah</p> <p>13 Merville. She mentioned being very scared and</p> <p>14 uncomfortable, to the extent that she had a knife under</p> <p>15 her pillow." You don't remember receiving this?</p> <p>16 A. I gave legal advice.</p> <p>17 Q. Do you remember -- I asked you, do you</p> <p>18 remember receiving the e-mail?</p> <p>19 MR. CAVALIER: Object to the form and</p> <p>20 object to asked and answered.</p> <p>21 THE WITNESS: I don't remember this</p> <p>22 particular e-mail.</p> <p>23 BY MR. CARSON:</p> <p>24 Q. You don't remember it, right? Right?</p> <p>25 A. I refer you to my previous answer.</p>

<p>Page 44</p> <p>1 Q. Exactly. I mean, we're going to get to the 2 bottom of this. But you just said you don't remember 3 receiving it, he puts his objection in and then you just 4 changed to I refer you to my previous answer. 5 MR. CAVALIER: I'm going to object to 6 that categorization. 7 BY MR. CARSON: 8 Q. Do you remember receiving the e-mail? 9 A. I answered that question ten times. 10 MR. CAVALIER: Object as asked and 11 answered. 12 THE COURT REPORTER: All right. All 13 right. All right. Gentlemen. Gentlemen, I can't keep 14 doing this. One at a time, please. 15 BY MR. CARSON: 16 Q. I've now read you the first paragraph of the 17 e-mail. Does that ring any bells? Do you remember yet? 18 MR. CAVALIER: Object to form. 19 THE WITNESS: I do not remember this 20 particular e-mail. I gave massive amount of legal 21 advice on the topic in the e-mail. 22 BY MR. CARSON: 23 Q. Uh-huh. "She mentioned being very scared and 24 uncomfortable to the extent that she had a knife under 25 her pillow." Did you remember that?</p>	<p>Page 46</p> <p>1 remember receiving it. How do you know you don't 2 remember receiving it when you didn't read it yet? 3 A. I've been staring at this e-mail for five 4 minutes. 5 Q. I'll continue. It hasn't been up for five 6 minutes. I'll continue, though. "When she mentioned 7 Gregg was being weird and had drank too much and was 8 making her feel uncomfortable, I asked her if he meant 9 he was getting the AIPAC couches. My reference was to 10 the night after our MEF dinner at AIPAC. Following the 11 dinner, we attended another AIPAC event where guests 12 were drinking before going to a bar. After the bar, MEF 13 staff and a few other AIPAC attendees went back to the 14 Airbnb where Gregg was staying. In the living room, 15 Gregg was sitting on the couch in between Lisa and 16 myself. Matt Bennett, Marnie Meyer, Raheem Kassam and 17 three other men who I did not know were all in the room 18 discussing work and possible collaborations. After 19 about 15 minutes, Gregg abruptly asked the three men to 20 leave the room. At that point, as the men were trying 21 to wrap up their conversations with Matt, Gregg put his 22 arm around Lisa and myself and pulled me in to him so 23 that I was almost in his lap and began whispering in my 24 ear that no other men should be in the room." Do you 25 remember that?</p>
<p>Page 45</p> <p>1 MR. CAVALIER: Object to form. Same 2 objections. 3 BY MR. CARSON: 4 Q. Did you remember receiving the e-mail now? 5 A. Seth, my answer's not going to change. I've 6 been consistent. I've not changed my answer at all. 7 Q. So you know that you're going to say that you 8 don't remember receiving it regardless of what the 9 e-mail says? 10 A. You could read it to me 30 times. I remember 11 that you read it to me three minutes ago. I do not 12 remember this particular e-mail and reading it. 13 Q. You haven't even read it. How come you're 14 testifying you don't remember receiving something that 15 you haven't even read? 16 MR. CAVALIER: Object to form. 17 BY MR. CARSON: 18 Q. Have you taken the time to read this e-mail 19 today? No, right? 20 MR. CAVALIER: Seth, you know what? 21 I'll just -- I'll let you ask the question. I mean, 22 you're asking him two different questions. 23 BY MR. CARSON: 24 Q. You have not taken the time to read this 25 e-mail today and you're testifying that you don't</p>	<p>Page 47</p> <p>1 A. I gave a lot of legal advice on those 2 issues -- those accusations. 3 Q. But this is what was discussed on November 4 5th, 2018, correct? 5 A. So now we're back at the meeting. 6 Q. This e-mail was sent the day before November 7 5th, 2018, correct? 8 A. I do not remember what happened at that 9 meeting except for how I previously characterized it. 10 Q. This is the e-mail she sent in advance of the 11 meeting, right? 12 MR. CAVALIER: Object to form. 13 THE WITNESS: I don't remember the 14 dates. 15 BY MR. CARSON: 16 Q. Well, we're looking at the dates right here. 17 You don't -- 18 A. Maybe it was after, maybe it was before. I 19 don't know. 20 Q. Well, we're looking at it. It was November 21 4th, 2018. 22 A. Okay. Well, when was the meeting? I don't 23 even know. 24 Q. You don't know when the November 5th meeting 25 was?</p>



<p>Page 48</p> <p>1 A. Okay, November 5th. So what's the question?</p> <p>2 Q. The question was, isn't this what was</p> <p>3 discussed at the November 5th meeting?</p> <p>4 A. I already characterized my memory of the</p> <p>5 meeting.</p> <p>6 Q. Nonresponsive.</p> <p>7 A. I have responded -- I've been responding for</p> <p>8 ten minutes. I can repeat what I said.</p> <p>9 Q. Wasn't this discussed at the meeting?</p> <p>10 A. I do not recall.</p> <p>11 Q. Well, this is more serious --</p> <p>12 A. That's your characterization.</p> <p>13 Q. -- than Gregg being a bad boss, correct?</p> <p>14 A. It wasn't his being a bad boss.</p> <p>15 MR. CAVALIER: Object to the form of the</p> <p>16 last question. Marc, you can move on.</p> <p>17 BY MR. CARSON:</p> <p>18 Q. It wasn't just being the bad boss, what do</p> <p>19 you mean by that?</p> <p>20 A. No, it meant that -- well, it was being a</p> <p>21 really hard boss and basically driving them crazy and</p> <p>22 they couldn't put up with it. But I don't remember -- I</p> <p>23 don't remember any other details. But that was -- they</p> <p>24 were going around ranting about him for, like, an hour.</p> <p>25 That's all I remember.</p>	<p>Page 50</p> <p>1 more concerned with him being a bad boss?</p> <p>2 A. Because they spent the vast majority of the</p> <p>3 meeting going on and on about what a hard boss he was.</p> <p>4 Q. You remember that?</p> <p>5 A. Yeah.</p> <p>6 Q. And you don't remember --</p> <p>7 A. Because it took up most of the time.</p> <p>8 Q. And you don't remember her talking about what</p> <p>9 she e-mailed the day before the meeting about?</p> <p>10 A. I do not. I don't remember much about the</p> <p>11 meeting.</p> <p>12 Q. You just remember it was about him being a</p> <p>13 bad boss, though? That you remember, right?</p> <p>14 A. Everybody took their turn and was saying how</p> <p>15 awful it was to work for him, yes.</p> <p>16 Q. Well, who took their turn?</p> <p>17 A. Including males; including Matthew Bennett.</p> <p>18 Q. Matthew Bennett complained about Mr. Roman's</p> <p>19 inappropriate behavior at the meeting; didn't he?</p> <p>20 MR. CAVALIER: Object to form.</p> <p>21 THE WITNESS: Matthew Bennett complained</p> <p>22 about Gregg Roman being a hardass boss who was very</p> <p>23 difficult to work with. That was the gist of the</p> <p>24 meeting that I remember.</p> <p>25 BY MR. CARSON:</p>
<p>Page 49</p> <p>1 Q. They were just ranting about Gregg Roman?</p> <p>2 A. Yes. Yep.</p> <p>3 Q. Nothing serious?</p> <p>4 MR. CAVALIER: Object to form.</p> <p>5 BY MR. CARSON:</p> <p>6 Q. Wasn't this more serious than being a bad</p> <p>7 boss?</p> <p>8 MR. CAVALIER: Object to form and use of</p> <p>9 the word "serious."</p> <p>10 BY MR. CARSON:</p> <p>11 Q. Wasn't this more concerning a report than</p> <p>12 being a bad boss?</p> <p>13 A. I've already answered you.</p> <p>14 Q. I don't know what you said.</p> <p>15 A. What are you asking me? Are we at the</p> <p>16 meeting?</p> <p>17 Q. Isn't it --</p> <p>18 A. My characterization of the meeting is as I've</p> <p>19 been telling you. They were much more concerned about</p> <p>20 him being a bad boss than any allegations of sexual</p> <p>21 harassment. I don't even remember them coming up.</p> <p>22 Q. How do you know what they were concerned</p> <p>23 about?</p> <p>24 A. I don't remember.</p> <p>25 Q. So then why are you saying they were much</p>	<p>Page 51</p> <p>1 Q. Did anyone ever report sexual harassment at</p> <p>2 that meeting?</p> <p>3 A. Again, I don't remember.</p> <p>4 Q. Did Mr. Pipes bring up this e-mail at the</p> <p>5 meeting?</p> <p>6 A. I don't remember.</p> <p>7 Q. Well, isn't that something that you think</p> <p>8 should have been brought up at the meeting?</p> <p>9 A. Ask him. I don't know.</p> <p>10 Q. Wasn't part of your job to help understanding</p> <p>11 these issues?</p> <p>12 A. My job was to give legal advice to the Middle</p> <p>13 East Forum officials and I did that a lot. And I was</p> <p>14 not involved any other way except I was at that meeting.</p> <p>15 Q. Do you believe this happened?</p> <p>16 MR. CAVALIER: Object to the form.</p> <p>17 BY MR. CARSON:</p> <p>18 Q. There's a question pending.</p> <p>19 A. Is there a question on the table?</p> <p>20 Q. Yeah.</p> <p>21 A. What's the question?</p> <p>22 Q. Do you believe this happened?</p> <p>23 A. Yeah, I'm not going -- that's an</p> <p>24 inappropriate line of questioning. I'm their attorney.</p> <p>25 I mean, are you going to have John and Dave -- put them</p>

<p>Page 52</p> <p>1 under oath and ask them?</p> <p>2 Q. I'm asking you, because you were there when</p> <p>3 it was reported, whether or not you believed the</p> <p>4 allegations.</p> <p>5 A. I was only at the meeting. I don't even</p> <p>6 remember what was said at the meeting. So you're asking</p> <p>7 me to give you an opinion on something I don't remember.</p> <p>8 Other than that, everything I know about this case was</p> <p>9 in the context of me giving legal advice.</p> <p>10 Q. You were cc'd on his response, too, correct?</p> <p>11 A. I was cc'd on a ton of stuff. So if you're</p> <p>12 going to ask me each one, I mean, I'm probably not going</p> <p>13 to remember it. I probably was cc'd on literally tens</p> <p>14 of thousands of e-mails.</p> <p>15 Q. You know before you look at the documents</p> <p>16 that you're not going to remember, right?</p> <p>17 MR. CAVALIER: Object to the form.</p> <p>18 THE WITNESS: Okay. Show me -- show me</p> <p>19 what you want me to look at.</p> <p>20 (Exhibit Fink-3 was marked for identification.)</p> <p>21 BY MR. CARSON:</p> <p>22 Q. Okay. Well, what about D1, which will be</p> <p>23 Fink-3?</p> <p>24 A. You've got to scroll up. Okay. So what</p> <p>25 about this? Again, this is -- okay, so I was copied on</p>	<p>Page 54</p> <p>1 A. I do not.</p> <p>2 Q. So when Daniel Pipes talks about performing</p> <p>3 this investigation yesterday, that had nothing to do</p> <p>4 with you?</p> <p>5 A. I'll repeat my previous answer if you want.</p> <p>6 Had nothing to do with any investigation. I only gave</p> <p>7 legal advice.</p> <p>8 Q. Do you know whether Daniel Pipes interviewed</p> <p>9 Mr. Roman?</p> <p>10 MR. CAVALIER: Objection. Same</p> <p>11 instruction as before. To the extent you can answer</p> <p>12 without divulging attorney-client information, you can</p> <p>13 answer.</p> <p>14 THE WITNESS: I assume that he</p> <p>15 interviewed everybody. I do not know what he did or how</p> <p>16 he did it or who he involved. But I will tell you that</p> <p>17 I assume that he interviewed everybody.</p> <p>18 BY MR. CARSON:</p> <p>19 Q. Well, Mr. Roman testified that you're the one</p> <p>20 who interviewed him.</p> <p>21 MR. CAVALIER: Objection to the --</p> <p>22 BY MR. CARSON:</p> <p>23 Q. So what's your response to that?</p> <p>24 MR. CAVALIER: Objection to form and</p> <p>25 objection to the foundation. To the extent you can</p>
<p>Page 53</p> <p>1 it. I don't remember reading it, but I certainly</p> <p>2 remember giving legal advice about this.</p> <p>3 Q. It says here that Daniel Pipes -- it says</p> <p>4 here that he investigated this matter yesterday. Do you</p> <p>5 see that?</p> <p>6 A. Uh-huh.</p> <p>7 Q. Do you help in this investigation at all?</p> <p>8 A. Absolutely not. I already answered that.</p> <p>9 Q. I was specifically referring to --</p> <p>10 A. I investigated nothing. But the contents of</p> <p>11 this e-mail, I gave a massive amount of legal advice.</p> <p>12 Q. Were you present when Gregg Roman said that</p> <p>13 he takes these matters -- were you present when Gregg</p> <p>14 Roman acknowledged that his conduct, whatever his</p> <p>15 intentions, were not acceptable?</p> <p>16 A. I don't remember.</p> <p>17 Q. And put these employees in a difficult</p> <p>18 position?</p> <p>19 A. I don't remember. I gave legal advice to the</p> <p>20 president, I gave legal advice to the director and</p> <p>21 sometimes I gave legal advice to both.</p> <p>22 Q. Were you present when he acknowledged himself</p> <p>23 as a social junkie?</p> <p>24 A. I don't remember.</p> <p>25 Q. Do you know what that means?</p>	<p>Page 55</p> <p>1 answer, you can answer.</p> <p>2 THE WITNESS: I don't know what he's</p> <p>3 thinking, but he's either misinformed, made a wrong</p> <p>4 assumption or didn't understand.</p> <p>5 BY MR. CARSON:</p> <p>6 Q. Okay. Did you -- you obviously know what</p> <p>7 retaliation is, correct?</p> <p>8 MR. CAVALIER: I'm going to object to</p> <p>9 the form.</p> <p>10 BY MR. CAVALIER:</p> <p>11 Q. I'm assuming you know because you're a</p> <p>12 lawyer.</p> <p>13 MR. CAVALIER: Same objection.</p> <p>14 BY MR. CARSON:</p> <p>15 Q. Retaliation under the Title 7?</p> <p>16 A. Obviously I know that, yes.</p> <p>17 Q. Were you involved in any measures at the</p> <p>18 Middle East Forum to make sure that there was no</p> <p>19 retaliation after these reports were made?</p> <p>20 MR. CAVALIER: Objection. Same</p> <p>21 instruction with respect to the privilege. Subject to</p> <p>22 that, to the extent you can answer, you can answer.</p> <p>23 THE WITNESS: Number one, I gave legal</p> <p>24 advice. Number two, I was not involved in personnel or</p> <p>25 management.</p>

<p>Page 56</p> <p>1 BY MR. CARSON:</p> <p>2 Q. Do you know whether the employees, Ms.</p> <p>3 McNulty, Ms. Meyer, Ms. Barbounis, Ms. Brady, continued</p> <p>4 to report issues related to discrimination and</p> <p>5 harassment in the workplace after November 5th, 2018?</p> <p>6 MR. CAVALIER: Same objection, same</p> <p>7 instruction.</p> <p>8 THE WITNESS: I gave legal advice on</p> <p>9 that.</p> <p>10 BY MR. CARSON:</p> <p>11 Q. I'm just asking if you know if they reported</p> <p>12 anything. Did they tell you anything?</p> <p>13 A. To me personally?</p> <p>14 Q. Yeah.</p> <p>15 A. No. No.</p> <p>16 Q. Did they include you in e-mails where they</p> <p>17 reported issues?</p> <p>18 A. Not to my knowledge.</p> <p>19 Q. I'm going to show you another document first.</p> <p>20 MR. CAVALIER: Seth, do you want to go</p> <p>21 off the record and take five while you're looking for</p> <p>22 your docs?</p> <p>23 MR. CARSON: No.</p> <p>24 BY MR. CARSON:</p> <p>25 Q. Did you send this e-mail?</p>	<p>Page 58</p> <p>1 over them.</p> <p>2 BY MR. CARSON:</p> <p>3 Q. It says, "Until further notice, please report</p> <p>4 to him, not to me."</p> <p>5 A. Yep, they did.</p> <p>6 Q. "This means fundraising activities, financial</p> <p>7 statements, weekly reports and so forth should be</p> <p>8 addressed to Marc and he will supervise your work,"</p> <p>9 correct?</p> <p>10 A. Yep, I did. That's what I referred to,</p> <p>11 again, before.</p> <p>12 Q. We can see here that you were -- see right</p> <p>13 here?</p> <p>14 A. Uh-huh.</p> <p>15 Q. You received this e-mail, correct?</p> <p>16 A. I don't dispute it. I just don't remember</p> <p>17 it.</p> <p>18 Q. So why did you only -- why were you put in</p> <p>19 charge of these women specifically?</p> <p>20 MR. CAVALIER: Object to form.</p> <p>21 THE WITNESS: I don't know.</p> <p>22 BY MR. CARSON:</p> <p>23 Q. Were you asked to supervise the work of any</p> <p>24 of the male employees?</p> <p>25 A. No, I was asked to supervise the work of</p>
<p>Page 57</p> <p>1 A. Excuse me?</p> <p>2 Q. Did you ever -- strike that.</p> <p>3 Did you ever read this e-mail?</p> <p>4 A. I do not remember that e-mail, no. We</p> <p>5 discussed this at the beginning.</p> <p>6 Q. Okay. It says here that you're acting --</p> <p>7 you're the new acting deputy director, right?</p> <p>8 A. I'm not familiar -- I never saw that e-mail.</p> <p>9 Maybe I got it. I'm not familiar with that title.</p> <p>10 Doesn't really mean anything. But I did explain to you</p> <p>11 what I did in the summer of 2019.</p> <p>12 Q. Well, this e-mail says that until further</p> <p>13 notice, Catriona Brady, Patricia McNulty, Marie Meyer,</p> <p>14 Delaney Yonchek have to report to you, correct?</p> <p>15 MR. CAVALIER: Objection to form.</p> <p>16 BY MR. CARSON:</p> <p>17 Q. That's what it says.</p> <p>18 THE WITNESS: Someone just said</p> <p>19 something.</p> <p>20 MR. CAVALIER: I just said objection to</p> <p>21 form. You can answer.</p> <p>22 THE WITNESS: Yeah. No, I explained</p> <p>23 that to you. I mean, I'm happy to discuss it more.</p> <p>24 They sent me weekly reports, they'd e-mail them to me,</p> <p>25 and I thanked them for them. I had no other authority</p>	<p>Page 59</p> <p>1 administrative employees and those are the employees who</p> <p>2 are -- those are the employees who are cc'd.</p> <p>3 Q. It just happens to be that the same employees</p> <p>4 you were asked to supervise are the ones --</p> <p>5 A. Those are all of them; there aren't any more.</p> <p>6 Q. Right. Agreed. One, two, three, four, five</p> <p>7 women, right?</p> <p>8 A. There were no -- there were no men. That was</p> <p>9 the administrative staff.</p> <p>10 Q. It includes the names of five women, correct?</p> <p>11 Lisa Barbounis, Catriona Brady, Patricia McNulty, Marnie</p> <p>12 Meyer and Delaney Yonchek, right?</p> <p>13 A. That's what it says in the e-mail.</p> <p>14 Q. And they're the five women who all brought</p> <p>15 claims involving Mr. Roman's discrimination and</p> <p>16 harassment based on sex and gender, right?</p> <p>17 MR. CAVALIER: Object to form. You can</p> <p>18 answer.</p> <p>19 BY MR. CARSON:</p> <p>20 Q. They are five women?</p> <p>21 A. I learned this from my legal representation.</p> <p>22 But it has nothing to do with the fact that those are</p> <p>23 the only administrative staffers.</p> <p>24 Q. Well --</p> <p>25 A. At that time.</p>

<p>Page 60</p> <p>1 Q. Isn't it true that that was done directly 2 after charges of discrimination were filed with the 3 EEOC? 4 MR. CAVALIER: Object to form. 5 THE WITNESS: Actually, no, it was done 6 in the summer of 2019. This whole thing started long 7 before then. 8 BY MR. CARSON: 9 Q. Didn't you receive an e-mail on June 29th, 10 2019 that Lisa Barbounis and Patricia McNulty had filed 11 charges with the EEOC just a week before that? 12 A. I don't remember. You could show me and I 13 could confirm it. 14 Q. Who's Gary? 15 MR. CAVALIER: Object to form. 16 THE WITNESS: Gary is a -- again, this 17 goes to me not knowing -- not being involved in 18 management and knowing what everybody does, but Gary -- 19 I believe he's a website manager. 20 BY MR. CARSON: 21 Q. He's a full-time employee who -- 22 A. He's not an administrative staffer. 23 Q. He's a male employee who works in the office 24 full-time, correct? 25 A. I do not believe he works in the office</p>	<p>Page 62</p> <p>1 7:28. 2 A. If you're asking me to identify something, 3 just scroll down to the -- to what he's responding to. 4 Q. So this is the e-mail that I believe is being 5 responded to. 6 A. Scroll to the top. Okay. I see I was 7 copied. I don't remember looking at this particular 8 e-mail. But I do remember the contents of the e-mail 9 because I gave legal advice on them. 10 Q. You remember the contents of this e-mail? 11 A. I remember giving legal advice on the 12 contents of the e-mail. 13 Q. So what is the contents of it -- what part of 14 the e-mail did you give legal advice on? 15 MR. CAVALIER: Object to form and 16 instruct you not to answer based on the attorney-client 17 privilege. 18 MR. CARSON: I'm just asking him to 19 point out the e-mail. 20 BY MR. CARSON: 21 Q. What part of this e-mail do you remember? 22 MR. CAVALIER: He already answered the 23 question. 24 THE WITNESS: I don't dispute that the 25 e-mail is legitimate.</p>
<p>Page 61</p> <p>1 full-time -- I don't -- strike that. I do not believe 2 he works in the office and I'm not sure if he works full 3 or part-time. I'm not sure if he's a contractor or an 4 employee. He's not part of the administrative staff. 5 He's, kind of, like a project director. 6 Q. In July of 2019, he worked in the office 7 full-time, right? 8 A. Again, to repeat my answer, I do not know. 9 Q. Was it done in response to the charges, you 10 being put in charge of the women? 11 A. I have no idea. Daniel Pipes asked me to do 12 it and I did it. 13 Q. Is it possible it was done in response to the 14 charges? 15 A. I have no idea. You'd have to ask -- I 16 cannot speculate on that. 17 Q. Do you have reason to believe it wasn't? 18 MR. CAVALIER: Objection. 19 THE WITNESS: Repeat my previous answer. 20 (Exhibit Fink-4 was marked for identification.) 21 BY MR. CARSON: 22 Q. All right. So the next document that we'll 23 look at is 21, so Fink Number 4. Fink-4 is D21 to 23. 24 Do you remember receiving these e-mails? This is the 25 response, so this is the e-mail to which 447 -- 4-23 at</p>	<p>Page 63</p> <p>1 BY MR. CARSON: 2 Q. I'm asking, what part of this e-mail do you 3 recall, or all of it? 4 A. I gave legal advice on the contents of that 5 e-mail. 6 Q. Well, which part? 7 MR. CAVALIER: Well, object to form and 8 object to -- he's not going to answer that question. 9 I'm instructing him not to answer. 10 THE WITNESS: I'm not going to answer. 11 BY MR. CARSON: 12 Q. Well, what part of the e-mail do you 13 remember? 14 MR. CAVALIER: That's asked and 15 answered. 16 THE WITNESS: I already answered. 17 BY MR. CARSON: 18 Q. Do you remember the whole e-mail? 19 A. I already answered. 20 Q. I'm asking, do you recall this entire e-mail? 21 A. I refer you to my previous answer. 22 Q. I'm asking you a different question. Do you 23 recall receiving this entire e-mail? 24 A. I answered that. 25 Q. You know exactly what this e-mail says?</p>



<p>Page 64</p> <p>1 A. I answered that. I just looked at it, I</p> <p>2 answered it.</p> <p>3 Q. Okay. So can you please describe what this</p> <p>4 e-mail says?</p> <p>5 MR. CAVALIER: You want him to describe</p> <p>6 the e-mail?</p> <p>7 BY MR. CARSON:</p> <p>8 Q. Yeah, what you remember about the e-mail.</p> <p>9 MR. CAVALIER: That's a different</p> <p>10 question. Same objection, same instruction.</p> <p>11 BY MR. CARSON:</p> <p>12 Q. I mean, I'm going to wait for an answer.</p> <p>13 A. I've already answered. I'm not going to</p> <p>14 answer any more.</p> <p>15 Q. You received an e-mail that was sent from my</p> <p>16 client, right? Right?</p> <p>17 A. Again, I already said, I see I'm cc'd. I</p> <p>18 don't dispute that.</p> <p>19 Q. And the e-mail was sent from Ms. McNulty to</p> <p>20 you, correct?</p> <p>21 A. No, it was not.</p> <p>22 Q. It was sent to you and Mr. Pipes?</p> <p>23 A. Nope. It was sent to Daniel Pipes; I was</p> <p>24 copied in.</p> <p>25 Q. What's the distinction you're making there?</p>	<p>Page 66</p> <p>1 MR. CAVALIER: Objection. Same</p> <p>2 instruction.</p> <p>3 BY MR. CARSON:</p> <p>4 Q. Why is it funny?</p> <p>5 A. It's funny because you're asking the same</p> <p>6 inappropriate questions 20 different times. I gave</p> <p>7 legal advice on this. I have nothing else to say about</p> <p>8 it.</p> <p>9 MR. CAVALIER: You're asking for a legal</p> <p>10 conclusion as well, Seth. He's not going to --</p> <p>11 MR. CARSON: He's a lawyer.</p> <p>12 THE WITNESS: Because it's comedic,</p> <p>13 that's why I'm laughing.</p> <p>14 BY MR. CARSON:</p> <p>15 Q. I know that you think that my client's</p> <p>16 allegations are comedic.</p> <p>17 A. No, what you're doing right now is comedic,</p> <p>18 so I laughed.</p> <p>19 Q. What's funny about it?</p> <p>20 A. Again, you're asking an inappropriate</p> <p>21 question 20 different ways. I'm not going to answer it.</p> <p>22 Q. Isn't my client, Patricia McNulty, trying to</p> <p>23 report retaliation?</p> <p>24 A. MR. CAVALIER: Same objection, same</p> <p>25 instruction.</p>
<p>Page 65</p> <p>1 You received the e-mail.</p> <p>2 A. When you send -- as someone who sends</p> <p>3 thousands of e-mails every week, when you send it to</p> <p>4 someone is a lot different than when you're copied on</p> <p>5 someone.</p> <p>6 Q. What's the difference?</p> <p>7 A. You are intending the person you send it to</p> <p>8 to respond. The person that you're copied, you just --</p> <p>9 you want to either make them aware or keep them in the</p> <p>10 loop. It doesn't require a response.</p> <p>11 Q. So but you did receive it, right?</p> <p>12 A. Again, I don't dispute that I received the</p> <p>13 e-mail.</p> <p>14 Q. "I received a phone call from Matt Bennett</p> <p>15 last night. He started the conversation with</p> <p>16 pleasantries, but then began to discuss current MEF</p> <p>17 internal operations. He apparently was speaking with</p> <p>18 Gregg every two days. Knew that Gary was back." Is</p> <p>19 that the same Gary that you just testified about?</p> <p>20 A. I assume.</p> <p>21 Q. "And also, that Marnie had made another</p> <p>22 allegation against Gregg," right?</p> <p>23 A. What's your question?</p> <p>24 Q. My question to you is, isn't this a report of</p> <p>25 retaliation?</p>	<p>Page 67</p> <p>1 BY MR. CARSON:</p> <p>2 Q. Isn't that what she's doing? I'm going to</p> <p>3 wait for an answer.</p> <p>4 MR. CAVALIER: He's already given you</p> <p>5 the answer.</p> <p>6 MR. CARSON: No, he hasn't. He hasn't</p> <p>7 answered that question. If he has, repeat it.</p> <p>8 MR. CAVALIER: He's telling you he</p> <p>9 already has.</p> <p>10 MR. CARSON: Well, if he has, just</p> <p>11 repeat the answer, then, because I don't remember what</p> <p>12 he said.</p> <p>13 BY MR. CARSON:</p> <p>14 Q. Isn't Ms. McNulty trying to report</p> <p>15 retaliation?</p> <p>16 MR. CAVALIER: You're not going to</p> <p>17 violate the privilege no matter how many different ways</p> <p>18 you ask it.</p> <p>19 MR. CARSON: I'm not asking that. I'm</p> <p>20 asking what my client was doing.</p> <p>21 MR. CAVALIER: How does he know what</p> <p>22 your client was doing?</p> <p>23 MR. CARSON: Because he was cc'd on the</p> <p>24 e-mail; he just said it.</p> <p>25 MR. CAVALIER: I think he's answered.</p>

<p>Page 68</p> <p>1 MR. CARSON: There's no implication to</p> <p>2 privilege here; none.</p> <p>3 BY MR. CARSON:</p> <p>4 Q. My client is reporting wrongful conduct --</p> <p>5 inappropriate conduct involving Gregg Roman, correct? I</p> <p>6 mean, we're just going to wait, so let me know when</p> <p>7 you're ready to answer the question. There's no</p> <p>8 privilege objection you can assert here.</p> <p>9 MR. CAVALIER: Seth, do me a favor. If</p> <p>10 you're going to eat while we're on the record, at least</p> <p>11 close your mouth while you're doing it.</p> <p>12 MR. CARSON: I'm just waiting for an</p> <p>13 answer.</p> <p>14 THE WITNESS: Maybe you could use your</p> <p>15 time more wisely and ask me things that I could actually</p> <p>16 answer instead of just reading me e-mails. Read it to</p> <p>17 the jury.</p> <p>18 BY MR. CARSON:</p> <p>19 Q. My client tried to report additional conduct</p> <p>20 involving Gregg Roman on April 23rd, 2019, correct?</p> <p>21 MR. CAVALIER: Object to form. Same</p> <p>22 instruction.</p> <p>23 MR. CARSON: You can't tell him not to</p> <p>24 answer based on a form objection. You're objecting to</p> <p>25 form and telling him not to answer based --</p>	<p>Page 70</p> <p>1 specifically.</p> <p>2 MR. CAVALIER: No, he said he has</p> <p>3 recollections of topics in the e-mail because he gave</p> <p>4 legal advice on them.</p> <p>5 MR. CARSON: I'm not asking him about</p> <p>6 that, I'm asking about my clients and what my client was</p> <p>7 communicating to him and to Daniel Pipes.</p> <p>8 MR. CAVALIER: Marc, to the extent you</p> <p>9 can answer the question without violating the</p> <p>10 attorney-client privilege, you can answer it.</p> <p>11 THE WITNESS: I can't characterize what</p> <p>12 she said. I mean, you're reading it in plain English,</p> <p>13 okay? I'm not your expert witness on your own client.</p> <p>14 I'm not going to answer that. You're asking me to do</p> <p>15 your job.</p> <p>16 BY MR. CARSON:</p> <p>17 Q. No, I'm actually asking you --</p> <p>18 A. You're asking me to do your job. You can</p> <p>19 characterize it.</p> <p>20 Q. "I came into work this morning completely</p> <p>21 discouraged. Why am I working so hard for someone who</p> <p>22 thinks so poorly of me and feel so confident exclaiming</p> <p>23 to just anyone except, of course, to me. I have heard</p> <p>24 nothing but good things and positivity about my work</p> <p>25 from Gregg. So to find out that he is saying very</p>
<p>Page 69</p> <p>1 MR. CAVALIER: I'm objecting to form --</p> <p>2 THE WITNESS: I gave legal advice on</p> <p>3 this.</p> <p>4 MR. CAVALIER: I'm objecting to the form</p> <p>5 in addition to instructing him not to answer to the</p> <p>6 extent he needs to violate the attorney-client</p> <p>7 privilege.</p> <p>8 MR. CARSON: I'm not asking about any</p> <p>9 communications with anyone. I'm asking him about the</p> <p>10 e-mail that we're looking at.</p> <p>11 MR. CAVALIER: The e-mail he already</p> <p>12 told you --</p> <p>13 BY MR. CARSON:</p> <p>14 Q. The e-mail indicates inappropriate conduct by</p> <p>15 Gregg Roman; isn't that correct?</p> <p>16 MR. CAVALIER: The e-mail that he has</p> <p>17 already told you multiple times he does not remember</p> <p>18 receiving outside the context of his legal advice to the</p> <p>19 Forum.</p> <p>20 MR. CARSON: It's sent by my client.</p> <p>21 It's the same thing as if he was at the meeting.</p> <p>22 MR. CAVALIER: He said he doesn't</p> <p>23 remember getting the e-mail. He's told you that</p> <p>24 repeatedly.</p> <p>25 MR. CARSON: He said he remembered it</p>	<p>Page 71</p> <p>1 different things to others behind my back is reminiscent</p> <p>2 of the past and extremely deflating," right? That's</p> <p>3 what she said?</p> <p>4 MR. CAVALIER: I'm going to object to</p> <p>5 the form --</p> <p>6 THE WITNESS: You're reading a letter</p> <p>7 into the record. I mean --</p> <p>8 MR. CAVALIER: Marc --</p> <p>9 BY MR. CARSON:</p> <p>10 Q. That's the e-mail that you received on April</p> <p>11 23rd, 2019, right?</p> <p>12 A. You've got 12 people here. You know, we've</p> <p>13 got a lot of things to do. I mean...</p> <p>14 Q. I mean, just answer the question, then we'll</p> <p>15 get through it faster.</p> <p>16 A. You're not asking me a question, you're</p> <p>17 reading your client's letter. Read it to the jury.</p> <p>18 MR. CAVALIER: Object to the form of the</p> <p>19 reading in that you got a couple words in there wrong.</p> <p>20 But to the extent you're asking him generally did you</p> <p>21 read that correctly, that's the question?</p> <p>22 THE WITNESS: You read it correctly.</p> <p>23 Well, maybe -- I don't know. Maybe I should pay more</p> <p>24 attention. Maybe you aren't reading it correctly.</p> <p>25 BY MR. CARSON:</p>

<p>Page 72</p> <p>1 Q. Well, I think you should pay attention.</p> <p>2 A. Okay. Well, you're reading a letter.</p> <p>3 Q. Obviously you're not paying attention.</p> <p>4 A. You're reading a letter. If you want to read</p> <p>5 it again, I will use our time to see if you're reading</p> <p>6 it correctly.</p> <p>7 Q. I'd be happy to read it again.</p> <p>8 A. Okay. So read it and I will tell you if</p> <p>9 you're reading it correctly.</p> <p>10 THE COURT REPORTER: Please. Please.</p> <p>11 Please, guys. Please.</p> <p>12 BY MR. CARSON:</p> <p>13 Q. "I came into work this morning completely</p> <p>14 discouraged. Why am I working so hard for someone who</p> <p>15 thinks so poorly of me and feel so confident exclaiming</p> <p>16 that to just anyone except, of course, for me. I've</p> <p>17 heard nothing but good things and positivity about my</p> <p>18 work from Gregg. So to find out that he is saying very</p> <p>19 different things to others behind my back is reminiscent</p> <p>20 of the past and extremely deflating."</p> <p>21 A. I testify here today that you read that</p> <p>22 correctly.</p> <p>23 Q. I read that correctly, right?</p> <p>24 A. Yes.</p> <p>25 Q. And you received that correct e-mail that I</p>	<p>Page 74</p> <p>1 again; no problem. I mean, it was everybody's. I do</p> <p>2 not remember receiving that particular e-mail. I see</p> <p>3 that I'm copied, I do not dispute that I received the</p> <p>4 e-mail.</p> <p>5 BY MR. CARSON:</p> <p>6 Q. Doesn't the e-mail implicate retaliation?</p> <p>7 MR. CAVALIER: Objection. Same</p> <p>8 instruction with respect to the privilege. To the</p> <p>9 extent you can answer, you can answer.</p> <p>10 THE WITNESS: I cannot answer that</p> <p>11 question.</p> <p>12 BY MR. CARSON:</p> <p>13 Q. It's a yes-or-no question. What's your</p> <p>14 opinion?</p> <p>15 A. It's your job to characterize your</p> <p>16 client's -- your client's case.</p> <p>17 Q. Well, what's your opinion? Does it implicate</p> <p>18 retaliation?</p> <p>19 A. Again, everything I know about this case I</p> <p>20 learned through my legal representation. I was not a</p> <p>21 witness, I was not hanging out with them, I was not in</p> <p>22 the office. So I'm not going to answer that question.</p> <p>23 Q. Well, you just read the e-mail -- I just read</p> <p>24 it to you. You said I read it correctly.</p> <p>25 A. I mean, you could just as well -- you could</p>
<p>Page 73</p> <p>1 read on April 23rd, 2019, correct?</p> <p>2 MR. CAVALIER: Objection.</p> <p>3 THE WITNESS: I don't remember receiving</p> <p>4 it, but I don't dispute it.</p> <p>5 BY MR. CARSON:</p> <p>6 Q. You don't remember receiving it?</p> <p>7 A. I receive thousands of e-mails.</p> <p>8 Q. I know that everyone is concerned that Gregg</p> <p>9 is back to his old ways."</p> <p>10 A. Am I supposed to be proofreading -- proofing</p> <p>11 you now? Okay. Go ahead.</p> <p>12 Q. "I know that everyone is concerned that Gregg</p> <p>13 is back to his old ways, but I truly wanted to believe</p> <p>14 that he had learned a lesson. The things that I was</p> <p>15 told last night make me believe otherwise."</p> <p>16 A. I testify that Seth Carson has read that</p> <p>17 correctly.</p> <p>18 Q. And that you received it on April 23rd, 2019?</p> <p>19 MR. CAVALIER: Objection. Asked and</p> <p>20 answered.</p> <p>21 BY MR. CARSON:</p> <p>22 Q. Right?</p> <p>23 MR. CAVALIER: You can answer it again,</p> <p>24 if you want, Marc, for the twelfth time.</p> <p>25 THE WITNESS: Okay. I'll answer it</p>	<p>Page 75</p> <p>1 ask John Cavalier, you could ask Dave Walton. Is that</p> <p>2 appropriate to ask an attorney that question?</p> <p>3 Q. Yes.</p> <p>4 MR. CAVALIER: I disagree.</p> <p>5 BY MR. CARSON:</p> <p>6 Q. Well, you're an attorney and sending e-mails</p> <p>7 saying I'm the new deputy director and I'm your boss</p> <p>8 now.</p> <p>9 A. I was not their boss. I'm happy to talk</p> <p>10 about that again. I'm not even familiar with the title.</p> <p>11 All I did is collect weekly reports and thank them for</p> <p>12 them.</p> <p>13 Q. You acted as their supervisor at this time.</p> <p>14 I mean -- right?</p> <p>15 A. Actually, no. Come to think of it, no. That</p> <p>16 was sent in April.</p> <p>17 Q. A couple months before.</p> <p>18 A. Yeah, so that was before. No.</p> <p>19 Q. Okay. But you do know that retaliation is</p> <p>20 when someone subjects someone to adverse employment</p> <p>21 action due to reports of discrimination and harassment</p> <p>22 in the workplace, right?</p> <p>23 A. I am generally familiar with what constitutes</p> <p>24 retaliation under Title 7 in the 1964 Civil Rights Act.</p> <p>25 MR. CARSON: I'm going to take a break;</p>



<p>Page 76</p> <p>1 I'll be back in five minutes.</p> <p>2 MR. CAVALIER: Marc, you can go off</p> <p>3 screen and mute your mic.</p> <p>4 THE VIDEOGRAPHER: We are off the</p> <p>5 record, 4:21.</p> <p>6 (A recess was taken from 4:21 p.m. until 4:32 p.m.)</p> <p>7 THE VIDEOGRAPHER: All right. Back on</p> <p>8 the record. It is 4:32 p.m.</p> <p>9 BY MR. CARSON:</p> <p>10 Q. Do you know anything about the counterclaims</p> <p>11 that MEF filed against Ms. Barbounis?</p> <p>12 MR. CAVALIER: Object to form. Same</p> <p>13 instructions with respect to the privilege. As a matter</p> <p>14 of fact, I'm going to instruct you not to answer that</p> <p>15 question because it's so broad, I can't imagine how you</p> <p>16 could possibly answer it without divulging</p> <p>17 attorney-client privilege.</p> <p>18 BY MR. CARSON.</p> <p>19 Q. It's a yes-or-no question. Do you know</p> <p>20 anything about the counterclaim?</p> <p>21 MR. CAVALIER: You can answer that yes</p> <p>22 or no.</p> <p>23 THE WITNESS: I'm going to assert</p> <p>24 privilege.</p> <p>25 BY MR. CARSON:</p>	<p>Page 78</p> <p>1 answered. Your witness is refusing to answer the</p> <p>2 question by inappropriately asserting a privilege that</p> <p>3 has no implication in the question.</p> <p>4 BY MR. CARSON:</p> <p>5 Q. So the question stands. Yes or no; do you</p> <p>6 know about the counterclaim?</p> <p>7 A. I'm not going to answer that question.</p> <p>8 Q. You have to. You can't assert a privilege</p> <p>9 when there's no privilege implication. All right. So</p> <p>10 why are you asserting privilege? Let's test your</p> <p>11 privilege theory. What's the basis of the privilege?</p> <p>12 What you know about the counterclaim is because of</p> <p>13 information people told you, you don't know --</p> <p>14 A. I advised the Middle East Forum about those</p> <p>15 issues.</p> <p>16 Q. That doesn't make it -- that's not -- maybe</p> <p>17 you misunderstand what privilege is. Privilege means</p> <p>18 communications from your client to you or you to your</p> <p>19 client. It doesn't mean that --</p> <p>20 A. Yes.</p> <p>21 Q. Right. So it doesn't mean that you --</p> <p>22 A. If you would like to show me something and</p> <p>23 you want me to look at something --</p> <p>24 Q. Well, have you ever checked the docket where</p> <p>25 the counterclaim was filed with Middle East Forum, Lisa</p>
<p>Page 77</p> <p>1 Q. It's a yes-or-no question. I'm not asking</p> <p>2 you to divulge anything. Do you know about the</p> <p>3 counterclaim?</p> <p>4 A. I'm not going to answer that.</p> <p>5 Q. There's no privilege implication. It's yes</p> <p>6 or no. Do you know about the counterclaim?</p> <p>7 A. I'm not going to answer the question.</p> <p>8 Q. You have to. You can't assert privilege when</p> <p>9 there's no privilege. I'm not asking you to tell me</p> <p>10 anything that anyone told you --</p> <p>11 A. Everything I may or may not know about that</p> <p>12 is in the context of the legal advice I gave to the</p> <p>13 Middle East Forum.</p> <p>14 Q. Really? Have you ever read the Complaint?</p> <p>15 That's not legal advice, right? That's a public record</p> <p>16 on the docket, right?</p> <p>17 MR. CAVALIER: The question is, is the</p> <p>18 Complaint a public record on the document? You can</p> <p>19 answer that.</p> <p>20 BY MR. CARSON:</p> <p>21 Q. The question is, do you know about the</p> <p>22 counterclaim?</p> <p>23 MR. CAVALIER: Objection. Asked and</p> <p>24 answered.</p> <p>25 MR. CARSON: No, it hasn't been</p>	<p>Page 79</p> <p>1 Barbounis --</p> <p>2 A. We have outside counsel for that.</p> <p>3 Q. So you've never looked at the docket?</p> <p>4 A. We have outside counsel.</p> <p>5 Q. I wasn't asking you whether you have outside</p> <p>6 counsel. I'm asking you whether you looked at the</p> <p>7 docket. You refuse to answer that?</p> <p>8 A. I do not look at any docket. We have outside</p> <p>9 counsel for that.</p> <p>10 Q. Have you ever read the Complaint, the</p> <p>11 counterclaim?</p> <p>12 A. I may have advised on it.</p> <p>13 Q. I'm not asking whether you advised, I'm</p> <p>14 asking whether you read it. I'm not sure why you</p> <p>15 guys --</p> <p>16 A. I did not -- I have nothing to do with it --</p> <p>17 Q. Nothing --</p> <p>18 A. -- except for giving legal advice. If you</p> <p>19 want to read it into the record, go right ahead.</p> <p>20 Q. Well, my question stands. Have you reviewed</p> <p>21 the counterclaim?</p> <p>22 MR. CAVALIER: That's a different</p> <p>23 question.</p> <p>24 THE WITNESS: I have outside counsel.</p> <p>25 BY MR. CARSON:</p>

<p>Page 80</p> <p>1 Q. That's not my -- I didn't ask you whether you</p> <p>2 had counsel.</p> <p>3 A. I'm not running the counterclaim. I'm not --</p> <p>4 Q. Have you reviewed it?</p> <p>5 A. I'm not leading the counterclaim.</p> <p>6 Q. Have you reviewed it?</p> <p>7 A. Again, hired outside counsel. I'm not</p> <p>8 familiar with it. I may have given legal advice.</p> <p>9 Q. So you're saying you never reviewed it?</p> <p>10 A. I'm not familiar with it. I may have given</p> <p>11 legal advice.</p> <p>12 Q. So you know --</p> <p>13 A. And I may have hired outside counsel.</p> <p>14 Q. Who did you hire? Are you referring to Cozen</p> <p>15 O'Connor?</p> <p>16 A. I'm not getting into legal advice or legal</p> <p>17 substantive --</p> <p>18 Q. These aren't privileged questions, Mr. Fink.</p> <p>19 A. It is.</p> <p>20 Q. No, it's not.</p> <p>21 A. I disagree with you. I mean, where are you</p> <p>22 even going with this?</p> <p>23 Q. Well, why don't you answer the questions and</p> <p>24 we'll see.</p> <p>25 A. I'm not familiar with it.</p>	<p>Page 82</p> <p>1 A. I hire outside counsel for that.</p> <p>2 Q. So it was your decision to engage outside --</p> <p>3 A. Not necessarily my decision, but I'm legal</p> <p>4 in-house counsel, so I'm involved in that. So again,</p> <p>5 you're in that territory where I'm giving legal advice.</p> <p>6 Q. Were you involved in the decision to</p> <p>7 blackmail my client in the case?</p> <p>8 MR. CAVALIER: Object to form. Object</p> <p>9 to the characterization.</p> <p>10 BY MR. CARSON:</p> <p>11 Q. Huh? Were you? Were you involved in that?</p> <p>12 MR. CAVALIER: You know what, Marc? You</p> <p>13 don't even have to answer that.</p> <p>14 THE WITNESS: I'm not going to answer</p> <p>15 it.</p> <p>16 BY MR. CARSON:</p> <p>17 Q. No, you do have to answer it, actually.</p> <p>18 A. I'm not going to answer it.</p> <p>19 MR. CAVALIER: Objection.</p> <p>20 BY MR. CARSON:</p> <p>21 Q. Are you aware that your client met with my</p> <p>22 client --</p> <p>23 MR. CAVALIER: That's a different</p> <p>24 question.</p> <p>25 BY MR. CARSON:</p>
<p>Page 81</p> <p>1 Q. You're not familiar at all with the</p> <p>2 counterclaim?</p> <p>3 A. Not familiar with it except for legal advice</p> <p>4 I may have given.</p> <p>5 Q. You know nothing about the counterclaim?</p> <p>6 A. Not familiar with it.</p> <p>7 Q. You've never read it?</p> <p>8 A. Not familiar with it.</p> <p>9 Q. You've never read it?</p> <p>10 A. I may have given legal advice on it.</p> <p>11 Q. I'm not sure why you want to do this all over</p> <p>12 again. I mean, if you're not there to --</p> <p>13 A. I'm not sure -- I'm not sure. Okay. Forget</p> <p>14 it.</p> <p>15 Q. What? Go ahead, answer it.</p> <p>16 A. I answered it. I was going to say something</p> <p>17 else, but I decided not to. I answered the question.</p> <p>18 Q. No, you actually are not answering the</p> <p>19 question. You're refusing to answer the question.</p> <p>20 A. I'm not familiar with it.</p> <p>21 Q. Do you know how much money my client stole</p> <p>22 from Middle East Forum?</p> <p>23 A. I'm not familiar with the counterclaim.</p> <p>24 Q. Are you familiar with the case MEF versus</p> <p>25 Lisa Barbounis?</p>	<p>Page 83</p> <p>1 Q. -- in the 30th Street Station and blackmailed</p> <p>2 her?</p> <p>3 MR. CAVALIER: Objection to form. Don't</p> <p>4 answer that, Marc. Ask a legitimate question and we'll</p> <p>5 move forward.</p> <p>6 MR. CARSON: It's a legitimate question.</p> <p>7 MR. CAVALIER: No, it's not. It's</p> <p>8 inflammatory --</p> <p>9 MR. CARSON: Yeah, it is.</p> <p>10 MR. CAVALIER: -- duress.</p> <p>11 THE COURT REPORTER: Gentlemen, I can't</p> <p>12 do this.</p> <p>13 BY MR. CARSON:</p> <p>14 Q. Did you help draft the illegal document that</p> <p>15 blackmails my client? Were you involved in that?</p> <p>16 MR. CAVALIER: Same instruction. Don't</p> <p>17 answer the question.</p> <p>18 BY MR. CARSON:</p> <p>19 Q. Do you know whether Daniel Pipes attempted to</p> <p>20 threaten my client with a RICO case?</p> <p>21 MR. CAVALIER: Instruct the witness not</p> <p>22 to answer.</p> <p>23 MR. CARSON: You can't instruct him not</p> <p>24 to answer.</p> <p>25 MR. CAVALIER: I just did.</p>

<p>Page 84</p> <p>1 MR. CARSON: Based on what?</p> <p>2 MR. CAVALIER: Based on privilege and</p> <p>3 based on the absurd nature of the inflammatory question.</p> <p>4 MR. CARSON: I mean, I have a document</p> <p>5 that Mr. Pipes gave my client that says that he's</p> <p>6 threatening her with a RICO case that never was filed.</p> <p>7 But all she has to do is stop all litigation and the</p> <p>8 RICO case won't be filed.</p> <p>9 MR. CAVALIER: Now that you've read that</p> <p>10 into the record --</p> <p>11 MR. CARSON: They'd cancel the RICO</p> <p>12 case.</p> <p>13 MR. CAVALIER: -- perhaps you would want</p> <p>14 to ask --</p> <p>15 MR. CARSON: Would you consider that</p> <p>16 blackmail?</p> <p>17 MR. CAVALIER: -- Mr. Pipes about that.</p> <p>18 But this witness is not going to answer questions that</p> <p>19 you inject your categorization of the documents into and</p> <p>20 he's not going to involve --</p> <p>21 BY MR. CARSON:</p> <p>22 Q. Do you have any knowledge about that?</p> <p>23 MR. CAVALIER: -- violate any privilege.</p> <p>24 Don't answer the question.</p> <p>25 MR. CARSON: I mean, we can sit here all</p>	<p>Page 86</p> <p>1 I'm talking about -- I'm not talking about</p> <p>2 communications between you and your client, I'm talking</p> <p>3 about communications with my clients.</p> <p>4 MR. CAVALIER: That's why I asked a</p> <p>5 clarifying question. That's a different question.</p> <p>6 MR. CARSON: Right.</p> <p>7 THE WITNESS: Can you repeat the</p> <p>8 question?</p> <p>9 BY MR. CARSON:</p> <p>10 Q. Yeah, sure. How many times did my clients</p> <p>11 report retaliation during the spring and the summer of</p> <p>12 2019?</p> <p>13 MR. CAVALIER: Object to form and object</p> <p>14 to the fact that it calls for a legal conclusion. To</p> <p>15 the extent you can answer subject to that, Marc, feel</p> <p>16 free.</p> <p>17 THE WITNESS: I want you to clarify your</p> <p>18 question. Are you asking if your clients went to me and</p> <p>19 reported things to me? Is that what you're asking?</p> <p>20 BY MR. CARSON:</p> <p>21 Q. How many times are you aware of their reports</p> <p>22 of retaliation?</p> <p>23 MR. CAVALIER: Same objection.</p> <p>24 THE WITNESS: To me?</p> <p>25 BY MR. CARSON:</p>
<p>Page 85</p> <p>1 night, I guess.</p> <p>2 MR. CAVALIER: We won't sit here all</p> <p>3 night, Seth. If you want to ask your question, ask the</p> <p>4 question and wrap your deposition up.</p> <p>5 BY MR. CARSON:</p> <p>6 Q. All right. Did you know that my client met</p> <p>7 with Mr. Pipes at the 30th Street Station?</p> <p>8 A. I may have given Mr. Pipes legal advice.</p> <p>9 Q. Well, did you or didn't you?</p> <p>10 A. I may have given Mr. Pipes legal advice.</p> <p>11 Q. Well, if you did, there's privilege. If you</p> <p>12 didn't, there's no privilege, right? Either you did or</p> <p>13 you didn't. Were you cc'd on any other e-mails where my</p> <p>14 clients reported retaliation?</p> <p>15 MR. CAVALIER: Object to form.</p> <p>16 BY MR. CARSON:</p> <p>17 Q. Well, how many e-mails did you receive where</p> <p>18 you were cc'd and my clients reported retaliation during</p> <p>19 the spring and summer of 2019?</p> <p>20 MR. CAVALIER: Objection. From anyone?</p> <p>21 MR. CARSON: Yeah.</p> <p>22 MR. CAVALIER: Then don't answer the</p> <p>23 question because it's obviously out of bounds with</p> <p>24 respect to the privilege.</p> <p>25 MR. CARSON: It's not out of bounds.</p>	<p>Page 87</p> <p>1 Q. Yeah.</p> <p>2 A. Directly to me?</p> <p>3 Q. Where you were either the recipient of the</p> <p>4 e-mail or a cc of the e-mail.</p> <p>5 A. No. Directly to me, zero.</p> <p>6 Q. Okay. How about where you were cc'd on the</p> <p>7 e-mail?</p> <p>8 A. I don't remember. I seem to be cc'd on a lot</p> <p>9 of e-mails.</p> <p>10 Q. Was it at least once?</p> <p>11 A. You could show me an e-mail.</p> <p>12 MR. CAVALIER: Object to form and object</p> <p>13 to the basis for the question calling for a legal</p> <p>14 conclusion.</p> <p>15 BY MR. CARSON:</p> <p>16 Q. I mean, was it at least once? That's my</p> <p>17 question.</p> <p>18 MR. CAVALIER: And I'm objecting based</p> <p>19 on the fact that you've injected the word "retaliation"</p> <p>20 into the question which requires him to give --</p> <p>21 MR. CARSON: That's not an objection.</p> <p>22 MR. CAVALIER: -- expert opinion in his</p> <p>23 answer.</p> <p>24 MR. CARSON: You're not allowed to tell</p> <p>25 him how to answer in your objection.</p>

<p>Page 88</p> <p>1 BY MR. CARSON:</p> <p>2 Q. And now that your lawyer has told you how to</p> <p>3 answer, do you want to answer the question?</p> <p>4 A. What's your question?</p> <p>5 Q. Was it at least once?</p> <p>6 A. Will you repeat the full question?</p> <p>7 Q. Yeah. Was it at least one time that you were</p> <p>8 either cc'd or a recipient of an e-mail where Lisa</p> <p>9 Barbounis, Patricia McNulty, Delaney Yonchek or Catriona</p> <p>10 Brady reported retaliation --</p> <p>11 MR. CAVALIER: Same objection.</p> <p>12 BY MR. CARSON:</p> <p>13 Q. -- in the spring and summer of 2019?</p> <p>14 MR. CAVALIER: Same objection with</p> <p>15 respect to the fact that it calls for a legal</p> <p>16 conclusion.</p> <p>17 MR. CARSON: It's a funny objection when</p> <p>18 the person who's -- the witness is a lawyer.</p> <p>19 MR. CAVALIER: If he's here as a lawyer,</p> <p>20 then the entire deposition is irrelevant. If he's here</p> <p>21 as a fact witness, he'll testify as to facts within his</p> <p>22 personal knowledge.</p> <p>23 MR. CARSON: Right. Well, his personal</p> <p>24 knowledge would probably include what retaliation is.</p> <p>25 BY MR. CARSON:</p>	<p>Page 90</p> <p>1 those e-mails.</p> <p>2 MR. CAVALIER: Seth, he's not going to</p> <p>3 give you an answer where he acknowledges that your</p> <p>4 clients were complaining of legal retaliation. That's</p> <p>5 not what he's here for. He's not here --</p> <p>6 MR. CARSON: Tell your client how to</p> <p>7 answer, get it out. Go ahead.</p> <p>8 MR. CAVALIER: You heard the objection.</p> <p>9 MR. CARSON: You want to tell him --</p> <p>10 THE WITNESS: I'm not going answer the</p> <p>11 question; I already did.</p> <p>12 BY MR. CARSON:</p> <p>13 Q. No, you haven't answered the question yet.</p> <p>14 A. I did.</p> <p>15 Q. I've asked it like five ways now. It's</p> <p>16 getting to be ridiculous.</p> <p>17 MR. CAVALIER: He's here as a fact</p> <p>18 witness, not as a legal expert.</p> <p>19 BY MR. CARSON:</p> <p>20 Q. Have you received at least one e-mail by way</p> <p>21 of either cc or direct recipient during the spring and</p> <p>22 the summer of 2019 where my clients reported issues that</p> <p>23 were related to retaliation?</p> <p>24 MR. CAVALIER: Why don't you define</p> <p>25 retaliation to see if he can give you a fact-based</p>
<p>Page 89</p> <p>1 Q. But go ahead. We're going off the subject.</p> <p>2 What's the answer? Was it at least once?</p> <p>3 MR. CAVALIER: Objection.</p> <p>4 THE WITNESS: Repeat the question.</p> <p>5 BY MR. CARSON:</p> <p>6 Q. I repeated it several times.</p> <p>7 A. Okay. You're going to have to repeat it very</p> <p>8 carefully.</p> <p>9 Q. Was it at least once when you were a</p> <p>10 recipient of an e-mail by way of either directly</p> <p>11 receiving the e-mail or cc'd on an e-mail where one of</p> <p>12 my clients reported retaliation in the spring or the</p> <p>13 summer of 2019?</p> <p>14 MR. CAVALIER: Same objection with</p> <p>15 respect the fact that it calls for a legal conclusion.</p> <p>16 BY MR. CARSON:</p> <p>17 Q. Was it at least once?</p> <p>18 MR. CAVALIER: And to form.</p> <p>19 BY MR. CARSON:</p> <p>20 Q. Now is when you answer. What are we doing?</p> <p>21 A. There's an objection. I disagree with your</p> <p>22 characterization also.</p> <p>23 Q. Was it at least one?</p> <p>24 A. At least one what?</p> <p>25 Q. Time that you were a recipient on one of</p>	<p>Page 91</p> <p>1 answer?</p> <p>2 BY MR. CARSON:</p> <p>3 Q. Sure. Where they complained about Gregg</p> <p>4 Roman's conduct?</p> <p>5 MR. CAVALIER: That's a different</p> <p>6 question. Marc, if you can answer that one.</p> <p>7 THE WITNESS: I'm sure I was cc'd on</p> <p>8 e-mails complaining about Gregg Roman's conduct. I</p> <p>9 don't remember any one in particular.</p> <p>10 BY MR. CARSON:</p> <p>11 Q. And we're talking about during the spring and</p> <p>12 summer of 2019 right now, correct? That's the time</p> <p>13 period that the question relates to.</p> <p>14 A. I answered, I assume I was cc'd on e-mails.</p> <p>15 I don't remember any one in particular.</p> <p>16 Q. How many e-mails were you -- estimate for me.</p> <p>17 A. No idea.</p> <p>18 Q. How many e-mails; was it more than one, was</p> <p>19 it more than two?</p> <p>20 A. I don't know. Show it to me.</p> <p>21 Q. Well, I'm asking you to testify.</p> <p>22 A. Don't know. Don't remember.</p> <p>23 Q. Well, when you receive an e-mail where</p> <p>24 someone reports issues related --</p> <p>25 A. I gave legal advice on all sorts of issues.</p>



<p>Page 92</p> <p>1 Q. Yeah, I'm not talking about --</p> <p>2 A. I never received an e-mail directly, to the</p> <p>3 best of my knowledge.</p> <p>4 Q. Well, you were cc'd on these e-mails,</p> <p>5 correct?</p> <p>6 A. You'd have to show me an e-mail.</p> <p>7 Q. No, you received e-mails where you were cc'd,</p> <p>8 right?</p> <p>9 A. You'd have to show me an e-mail.</p> <p>10 Q. I'm asking generally whether you were cc'd on</p> <p>11 e-mails where my clients reported concerns relating</p> <p>12 Gregg Roman in the spring and summer of 2019 --</p> <p>13 A. I assume I was cc'd on e-mails, yes.</p> <p>14 Q. So it's simple. I don't know why you're</p> <p>15 making this difficult. How many e-mails do you</p> <p>16 remember --</p> <p>17 A. I answered that; I have no idea.</p> <p>18 Q. Can you estimate?</p> <p>19 A. No.</p> <p>20 Q. Was it at least ten?</p> <p>21 A. I have no idea. But you're welcome to show</p> <p>22 me the e-mails; we could read through them.</p> <p>23 Q. Sure. I was trying to help everyone get out</p> <p>24 of here fast, but that's fine. Did you ever read this</p> <p>25 e-mail?</p>	<p>Page 94</p> <p>1 Q. Did you ever see this e-mail before, is the</p> <p>2 question.</p> <p>3 MR. CAVALIER: Same objection, same</p> <p>4 instruction.</p> <p>5 THE WITNESS: I never saw that e-mail.</p> <p>6 BY MR. CARSON:</p> <p>7 Q. Well, my client says that Gregg Roman</p> <p>8 continues to spew slander regarding work and reputation.</p> <p>9 A. I'm not copied on that e-mail.</p> <p>10 Q. Never saw it in any other context?</p> <p>11 A. I may have given legal advice.</p> <p>12 MR. CAVALIER: Same objection and same</p> <p>13 instruction.</p> <p>14 BY MR. CARSON:</p> <p>15 Q. Well, did you or didn't you? You can't just</p> <p>16 say you may have. If you did, then it's privileged. If</p> <p>17 you didn't, then it's not privileged.</p> <p>18 MR. CAVALIER: If he didn't give legal</p> <p>19 advice and he's never seen it, then it's a completely</p> <p>20 irrelevant e-mail.</p> <p>21 MR. CARSON: That's not true. I could</p> <p>22 explain plenty of ways how it's relevant. Would you</p> <p>23 like me to?</p> <p>24 MR. CAVALIER: I didn't argue with you</p> <p>25 the e-mail's not relevant. But if he's not given legal</p>
<p>Page 93</p> <p>1 MR. CAVALIER: Objection. Same</p> <p>2 instruction with respect to the privilege. He's not</p> <p>3 copied on this e-mail.</p> <p>4 BY MR. CARSON:</p> <p>5 Q. Yeah, now, that your lawyer told you how to</p> <p>6 answer, have you ever seen this e-mail?</p> <p>7 MR. CAVALIER: Seth, I'm only going to</p> <p>8 let you do that so many more times before I get fed up.</p> <p>9 I'm just letting you know.</p> <p>10 THE WITNESS: I'm not copied on that</p> <p>11 e-mail.</p> <p>12 MR. CARSON: Well, I should be fed up.</p> <p>13 You're the one who's inappropriately instructing your</p> <p>14 witness how to answer with totally inappropriate</p> <p>15 speaking objections that have no relation to this case</p> <p>16 or the questions that I'm asking.</p> <p>17 MR. CAVALIER: Yeah, and you have the</p> <p>18 nerve --</p> <p>19 MR. CARSON: So I'm the one who should</p> <p>20 be fed up.</p> <p>21 MR. CAVALIER: -- (indecipherable) and</p> <p>22 you won't do so here. So stop cluttering up the record</p> <p>23 with your ridiculous gratuitous remarks and ask the</p> <p>24 questions.</p> <p>25 BY MR. CARSON:</p>	<p>Page 95</p> <p>1 advice on it and he's never seen it, what question could</p> <p>2 you possibly have for him?</p> <p>3 MR. CARSON: Plenty. But first I'd like</p> <p>4 to establish -- if you gave legal advice on it, I'll</p> <p>5 move on.</p> <p>6 BY MR. CARSON:</p> <p>7 Q. Did you or didn't you?</p> <p>8 A. You want me to -- okay. I'll be happy to. I</p> <p>9 gave legal advice on this.</p> <p>10 Q. When, when it was sent?</p> <p>11 MR. CAVALIER: You don't have to answer</p> <p>12 that.</p> <p>13 BY MR. CARSON:</p> <p>14 Q. Well, when; when are we talking about? In</p> <p>15 connection with depositions, back when it was sent?</p> <p>16 MR. CAVALIER: He's not going to tell</p> <p>17 you when he gave legal advice.</p> <p>18 MR. CARSON: Why?</p> <p>19 MR. CAVALIER: Because it's privileged.</p> <p>20 MR. CARSON: It's privileged when</p> <p>21 someone had a conversation?</p> <p>22 MR. CAVALIER: Yes.</p> <p>23 MR. CARSON: Okay. I would suggest that</p> <p>24 it's not privileged. I'll give you another opportunity</p> <p>25 to answer.</p>

<p>Page 96</p> <p>1 MR. CAVALIER: We'll decline that</p> <p>2 opportunity.</p> <p>3 MR. CARSON: Okay. I mean, I'm just</p> <p>4 building up a record of refusing to answer questions</p> <p>5 based on inappropriate objections.</p> <p>6 BY MR. CARSON:</p> <p>7 Q. How about this one? Did you give legal</p> <p>8 advice on this e-mail?</p> <p>9 A. Yeah, I gave a lot of legal advice on these</p> <p>10 issues.</p> <p>11 Q. Did you ever perform any investigations with</p> <p>12 regard to these e-mails?</p> <p>13 A. Seth, I mean, I told you emphatically, I was</p> <p>14 not involved in any investigation.</p> <p>15 Q. For any woman in the history of the Middle</p> <p>16 East Forum alleging sexual harassment?</p> <p>17 A. Nope. Nope.</p> <p>18 Q. Absolutely positively not?</p> <p>19 A. Yeah -- positively no.</p> <p>20 Q. My client was given permission to work with</p> <p>21 Tommy Robinson, correct?</p> <p>22 A. I have no idea. I'm not involved in</p> <p>23 administration or personnel.</p> <p>24 Q. Well, didn't you send her e-mails about it?</p> <p>25 A. Excuse me?</p>	<p>Page 98</p> <p>1 weekly activities. And she apparently went somewhere</p> <p>2 without notifying me that it was political -- or</p> <p>3 notifying anybody.</p> <p>4 Q. Well, then it turned out she did notify</p> <p>5 somebody, right?</p> <p>6 A. What's that?</p> <p>7 Q. Her response, it turned out she had</p> <p>8 permission, right?</p> <p>9 A. Yeah, looks like it.</p> <p>10 MR. CARSON: I don't have any other</p> <p>11 questions. I'm done.</p> <p>12 THE WITNESS: Okay.</p> <p>13 MR. CARSON: Thank you, everybody. I'm</p> <p>14 logging of. Does anyone have any questions of me</p> <p>15 regard, like, exhibits or anything?</p> <p>16 MR. CAVALIER: No, there's nothing from</p> <p>17 me to Marc, but you've got to let Sid or Bill decide</p> <p>18 whether they want to ask any questions of this witness.</p> <p>19 MR. GOLD: No questions. Thank you.</p> <p>20 (The deposition was concluded at 5:19 p.m.)</p> <p>21 * * *</p>
<p>Page 97</p> <p>1 Q. Didn't you send her e-mails about her work</p> <p>2 with Tommy Robinson?</p> <p>3 A. I don't believe so.</p> <p>4 MR. CARSON: Okay. So Fink Number 6 --</p> <p>5 I think 6 -- will be D-18.</p> <p>6 (Exhibit Fink-6 was marked for identification.)</p> <p>7 BY MR. CARSON:</p> <p>8 Q. How about this e-mail?</p> <p>9 A. I can't see what you're doing.</p> <p>10 Q. This one.</p> <p>11 MR. CAVALIER: What's your question?</p> <p>12 MR. FINK: Hold on. That was the wrong</p> <p>13 one.</p> <p>14 BY MR. CARSON:</p> <p>15 Q. But you did send this e-mail, right?</p> <p>16 A. Looks like it.</p> <p>17 MR. CARSON: But that wasn't the right</p> <p>18 one.</p> <p>19 (Exhibit Fink-7 was marked for identification.)</p> <p>20 BY MR. CARSON:</p> <p>21 Q. So D18, Fink-7 was -- so here. Isn't this</p> <p>22 administrative stuff that you did in connection with</p> <p>23 Lisa and Tommy Robinson? So Fink-7 is D29.</p> <p>24 A. Yeah, I didn't remember sending this, but I</p> <p>25 recognize it now. This is when I was supervising their</p>	

## INSTRUCTIONS TO WITNESS

Read your deposition over carefully.

It is your right to read your deposition and make changes in form or substance. You should assign a reason in the appropriate column on the errata sheet for any change made.

After making any change in form or substance which has been noted on the following errata sheet, along with the reason for any change, sign your name on the errata sheet and date it.

Then sign your deposition at the end of your testimony in the space provided. You are signing it subject to the changes you have made in the errata sheet, which will be attached to the deposition before filing. You must sign in the space provided. The witness need not be a notary public. Any competent adult may witness your signature.

Return the original errata sheet to the court reporter promptly! Court rules require filing within 30 days after you receive the deposition.



## ERRATA SHEET

PAGE	LINE	CHANGE	REASON
------	------	--------	--------

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

1 SIGNATURE PAGE

2 OF

3 MARC FINK

4  
5 I hereby acknowledge that I have  
6 read the foregoing deposition, dated TUESDAY, NOVEMBER  
7 24, 2020, and that the same is a true and correct  
8 transcription of the answers given by me to the  
9 questions propounded, except for the changes, if any,  
10 noted on the attached errata sheet.  
11  
12

13 SIGNATURE:

14  
15 DATE:

16  
17  
18  
19 WITNESSED BY:

20  
21 DATE:  
22  
23  
24  
25

## C E R T I F I C A T E

I, Pamela Pratt, Court Reporter and Notary Public in and for the Commonwealth of Pennsylvania, certify that the foregoing is a true and accurate transcript of the deposition of said witness taken by me on the date and place hereinbefore set forth.

I further certify that I am neither attorney nor counsel for, nor related to or employed by, any of the parties to the action in which this deposition was taken, and further, that I am not a relative or employee of any attorney or counsel employed in this action, nor am I financially interested in this case.

Pamela Pratt, Court Reporter  
Notary Public

**WORD INDEX**

&lt; 1 &gt;

**11-4-2018** 42:8**12** 71:12**15** 46:19**1650** 2:1**1835** 2:1**19103** 2:1**1964** 75:24**1994** 8:13, 14**1st** 43:6

&lt; 2 &gt;

**2** 40:17**2:19-cv-05030** 1:1**20** 16:11 66:6, 21**2012** 7:7, 21 8:16, 18**2015** 12:12, 16 13:10, 17**2016** 13:18**2018** 21:9 23:15

36:18 37:3 47:4, 7, 21 56:5

**2019** 18:21, 24 57:11

60:6, 10 61:6 68:20

71:11 73:1, 18 85:19

86:12 88:13 89:13

90:22 91:12 92:12

**2020** 1:1 4:9 101:7**21** 61:23**215)391-4790** 2:1**215)569-1999** 2:1**215)665-2000** 2:1**219-cv-05030** 4:14**23** 61:23**23rd** 68:20 71:11

73:1, 18

**24** 1:1 101:7**24th** 4:9**2950** 2:1**29th** 60:9

&lt; 3 &gt;

**3:03** 1:1 4:10**30** 45:10 99:23**30th** 83:1 85:7

&lt; 4 &gt;

**4** 61:23**4:21** 76:5, 6**4:32** 76:6, 8**40** 3:1**4-23** 61:25**447** 61:25**4th** 47:21

&lt; 5 &gt;

**5** 3:1**5:19** 98:20**515** 2:1**52** 3:1**5th** 21:9 23:15  
36:18 37:3 47:4, 7,  
24 48:1, 3 56:5

&lt; 6 &gt;

**6** 97:4, 5**61** 3:1

&lt; 7 &gt;

**7** 55:15 75:24**7:28** 62:1

&lt; 9 &gt;

**97** 3:1

&lt; A &gt;

**abruptly** 46:19**absolutely** 18:13  
19:17 31:18 53:8  
96:18**absurd** 84:3**acceptable** 53:15**accurate** 102:7**accusations** 47:2**acknowledge** 15:15,  
19 101:5**acknowledged** 53:14,  
22**acknowledges** 90:3**Act** 75:24**acted** 75:13**acting** 57:6, 7**ACTION** 1:1 6:21  
75:21 102:13, 16**activities** 10:9 58:6  
98:1**addition** 69:5**additional** 68:19**addressed** 58:8**addresses** 27:14**administration** 10:22  
96:23**administrative** 18:22  
59:1, 9, 23 60:22

61:4 97:22

**adult** 99:19**advance** 47:10**adverse** 75:20**advice** 10:16, 2411:2, 23 13:25 14:3,  
11, 15, 20, 21, 23 16:1  
18:5, 8 19:25 21:20  
23:11, 19, 22, 24 24:1,  
5, 6, 16, 25 25:15

26:14, 17, 21, 22, 23

27:21 28:16, 20

29:15 32:12, 16, 18,

19, 25 36:21 43:16

44:21 47:1 51:12

52:9 53:2, 11, 19, 20,

21 54:7 55:24 56:8

62:9, 11, 14 63:4

66:7 69:2, 18 70:4

77:12, 15 79:18 80:8,

11, 16 81:3, 10 82:5

85:8, 10 91:25 94:11,

19 95:1, 4, 9, 17 96:8,  
9**advised** 78:14 79:12,  
13**afternoon** 5:4, 5**ago** 39:3 45:11**agreed** 4:2 59:6**ahead** 7:2 25:6 36:1,  
3, 4 39:1 42:12

73:11 79:19 81:15

89:1 90:7

**AIPAC** 46:9, 10, 11,  
13**Airbnb** 46:14**al** 1:1 4:13**allegation** 34:17

38:11 65:22

**allegations** 12:15, 23  
29:24 31:20, 21 32:734:2, 25 36:19 37:7,  
16 49:20 52:4 66:16**allege** 35:5**alleged** 12:23 28:25  
29:6, 12, 21 38:11, 17  
42:22**alleging** 96:16**allowed** 87:24**amount** 44:20 53:11**Amy** 10:9, 14 11:3,  
12**answer** 5:16, 18, 1911:1 12:20 14:19  
17:25 18:2, 12 21:16,  
24 22:11, 12 23:7, 18  
24:4, 9, 13, 15, 1725:1, 12, 13, 22 26:10,  
11, 13, 21 27:9 28:3,

4, 22 29:9, 20 31:8,

15 32:1, 3, 24 34:10,  
11, 21, 22 36:20 37:1,

24 38:1, 8, 14 39:20

40:5 43:25 44:4

45:6 54:5, 11, 13

55:1, 22 57:21 59:18

61:8, 19 62:16 63:8,

9, 10, 21 64:12, 14

66:21 67:3, 5, 11

68:7, 13, 16, 24, 25

69:5 70:9, 10, 14

71:14 73:23, 25 74:9,  
10, 22 76:14, 16, 21

77:4, 7, 19 78:1, 7

79:7 80:23 81:15, 19

82:13, 14, 17, 18 83:4,  
17, 22, 24 84:18, 24

85:22 86:15 87:23,

25 88:3 89:2, 20

90:3, 7, 10 91:1, 6

93:6, 14 95:11, 25

96:4

**answered** 43:20 44:9,  
11 49:13 53:8 62:2263:15, 16, 19, 24 64:1,  
2, 13 67:7, 25 73:20

77:24 78:1 81:16, 17

90:13 91:14 92:17

**answering** 35:23

81:18

<p> <b>answers</b> 5:14 22:14  101:8  <b>answer's</b> 34:4 45:5  <b>anybody</b> 98:3  <b>apologize</b> 22:1  <b>apparently</b> 65:17  98:1  <b>appear</b> 5:15  <b>APPEARANCES</b> 2:1  <b>appearing</b> 4:18  <b>appears</b> 27:23  <b>appropriate</b> 28:9, 17  75:2 99:5  <b>April</b> 68:20 71:10  73:1, 18 75:16  <b>argue</b> 94:24  <b>arm</b> 46:22  <b>asked</b> 15:15 24:24  25:2, 5, 7 32:3 43:17,  20 44:10 46:8, 19  58:23, 25 59:4 61:11  63:14 73:19 77:23  86:4 90:15  <b>asking</b> 14:3, 4, 14, 15,  16, 17 23:13, 22, 23  24:1, 2, 11 28:14  30:8 32:18, 19 39:1,  2, 4 42:21 45:22  49:15 52:2, 6 56:11  62:2, 18 63:2, 20, 22  66:5, 9, 20 67:19, 20  69:8, 9 70:5, 6, 14, 17,  18 71:16, 20 77:1, 9  79:5, 6, 13, 14 86:18,  19 91:21 92:10  93:16  <b>assaulted</b> 37:17  <b>assert</b> 29:14 68:8  76:23 77:8 78:8  <b>asserting</b> 78:2, 10  <b>assign</b> 99:4  <b>assists</b> 6:16  <b>ASSOCIATES</b> 2:1  <b>assume</b> 5:20 20:15,  20, 21 21:5 54:14, 17  65:20 91:14 92:13  <b>assuming</b> 28:6 55:11  <b>assumption</b> 55:4  <b>attached</b> 99:16 </p>	<p> 101:10  <b>attempted</b> 83:19  <b>attend</b> 23:14  <b>attended</b> 46:11  <b>attendees</b> 46:13  <b>attention</b> 71:24 72:1,  3  <b>Attorney</b> 3:1 51:24  75:2, 6 102:12, 15  <b>attorney-client</b> 12:21  18:2 21:18 28:3  31:9 34:10 54:12  62:16 69:6 70:10  76:17  <b>authority</b> 18:24  57:25  <b>avoid</b> 31:13  <b>aware</b> 10:19 12:15  24:20 25:9, 15, 16  26:19, 22, 24 27:6, 18  43:7 65:9 82:21  86:21  <b>awareness</b> 24:15  <b>awful</b> 50:15    <b>&lt; B &gt;</b>  <b>back</b> 35:16 46:13  47:5 65:18 71:1  72:19 73:9, 13 76:1,  7 95:15  <b>backfire</b> 22:20 23:1  <b>backfired</b> 22:18  <b>bad</b> 48:13, 14, 18  49:6, 12, 20 50:1, 13  <b>Ballpark</b> 10:3 12:4  <b>bankrupt</b> 6:22  <b>bar</b> 46:12  <b>BARBOUNIS</b> 1:1  4:12 17:22 33:13  43:8 56:3 59:11  60:10 76:11 79:1  81:25 88:9  <b>Barbounis's</b> 18:9  <b>barely</b> 33:12  <b>based</b> 24:13, 14  36:22 37:6 38:10  59:16 62:16 68:24,  25 84:1, 2, 3 87:18  96:5  <b>basically</b> 48:21 </p>	<p> <b>basis</b> 17:13 28:2  78:11 87:13  <b>Bates-stamped</b> 40:25  <b>began</b> 11:11, 16 12:2  46:23 65:16  <b>beginning</b> 1:1 20:2  57:5  <b>behavior</b> 50:19  <b>believe</b> 7:7 8:12, 14  12:11 19:2, 8 51:15,  22 60:19, 25 61:1, 17  62:4 73:13, 15 97:3  <b>believed</b> 52:3  <b>bells</b> 44:17  <b>Bennett</b> 46:16 50:17,  18, 21 65:14  <b>best</b> 11:14 13:11, 14  33:5, 11 92:3  <b>better</b> 10:20  <b>biggest</b> 37:10  <b>Bill</b> 98:17  <b>blackmail</b> 82:7 84:16  <b>blackmailed</b> 83:1  <b>blackmails</b> 83:15  <b>block</b> 27:14  <b>Bloom</b> 33:18  <b>blur</b> 12:10  <b>boss</b> 11:22 37:11  38:15, 21 39:9 42:23  48:13, 14, 18, 21 49:7,  12, 20 50:1, 3, 13, 22  75:7, 9  <b>bottom</b> 44:2  <b>bounds</b> 85:23, 25  <b>Brady</b> 56:3 57:13  59:11 88:10  <b>break</b> 75:25  <b>briefly</b> 6:11  <b>bring</b> 51:4  <b>broad</b> 76:15  <b>brought</b> 51:8 59:14  <b>building</b> 96:4  <b>Bylaws</b> 8:4, 15    <b>&lt; C &gt;</b>  <b>call</b> 22:24 43:10  65:14  <b>called</b> 8:4 32:11, 14  36:18, 22 37:7, 8  <b>calling</b> 87:13 </p>	<p> <b>calls</b> 86:14 88:15  89:15  <b>Campus</b> 7:15  <b>cancel</b> 84:11  <b>carefully</b> 89:8 99:2  <b>CARSON</b> 2:1 3:1  5:3, 6 6:1, 2 9:3, 12,  18, 24 11:10 13:1  14:2 17:4 18:7, 14  21:7, 22 22:2, 7, 10,  15, 20, 23 23:5, 12, 21  24:11, 19 25:2, 7, 8,  14, 20 26:9 27:12, 15,  17 28:8, 13, 24 29:5,  11 30:20 31:4, 11, 19  32:2, 5, 17 33:8  34:15 35:2, 24 36:9,  16 37:2 38:4, 5, 16,  24 39:19, 24 40:1, 4,  7, 14, 20 41:20 42:5,  17 43:5, 23 44:7, 15,  22 45:3, 17, 23 47:15  48:17 49:5, 10 50:25  51:17 52:21 54:18,  22 55:5, 14 56:1, 10,  23, 24 57:16 58:2, 22  59:19 60:8, 20 61:21  62:18, 20 63:1, 11, 17  64:7, 11 66:3, 11, 14  67:1, 6, 10, 13, 19, 23  68:1, 3, 12, 18, 23  69:8, 13, 20, 25 70:5,  16 71:9, 25 72:12  73:5, 16, 21 74:5, 12  75:5, 25 76:9, 18, 25  77:20, 25 78:4 79:25  82:10, 16, 20, 25 83:6,  9, 13, 18, 23 84:1, 4,  11, 15, 21, 25 85:5, 16,  21, 25 86:6, 9, 20, 25  87:15, 21, 24 88:1, 12,  17, 23, 25 89:5, 16, 19  90:6, 9, 12, 19 91:2,  10 93:4, 12, 19, 25  94:6, 14, 21 95:3, 6,  13, 18, 20, 23 96:3, 6  97:4, 7, 14, 17, 20  98:10, 13  <b>Case</b> 4:14 52:8  74:16, 19 81:24 82:7 </p>
---	---	---	---



83:20 84:6, 8, 12  
93:15 102:17  
**categorization** 44:6  
84:19  
**Catriona** 57:13  
59:11 88:9  
**CAVALIER** 2:1  
5:23 9:21 11:5  
12:17 13:23 17:24  
18:11 21:1, 16 22:5,  
8, 13, 16 23:2, 8, 16  
24:8, 14, 22 25:4, 11,  
18 26:6 27:8, 13  
28:1, 11, 19, 21 29:2,  
8 30:14, 25 31:7, 14,  
23 32:4, 15, 22 33:3  
34:8, 19 35:15 36:7,  
24 37:22 38:13, 22  
39:12, 15, 21, 25 40:2,  
12 41:19, 25 42:16  
43:2, 19 44:5, 10, 18  
45:1, 16, 20 47:12  
48:15 49:4, 8 50:20  
51:16 52:17 54:10,  
21, 24 55:8, 10, 13, 20  
56:6, 20 57:15, 20  
58:20 59:17 60:4, 15  
61:18 62:15, 22 63:7,  
14 64:5, 9 66:1, 9, 24  
67:4, 8, 16, 21, 25  
68:9, 21 69:1, 4, 11,  
16, 22 70:2, 8 71:4, 8,  
18 73:2, 19, 23 74:7  
75:1, 4 76:2, 12, 21  
77:17, 23 79:22 82:8,  
12, 19, 23 83:3, 7, 10,  
16, 21, 25 84:2, 9, 13,  
17, 23 85:2, 15, 20, 22  
86:4, 13, 23 87:12, 18,  
22 88:11, 14, 19 89:3,  
14, 18 90:2, 8, 17, 24  
91:5 93:1, 7, 17, 21  
94:3, 12, 18, 24 95:11,  
16, 19, 22 96:1 97:11  
98:16  
**cc** 87:4 90:21  
**cc'd** 52:10, 11, 13  
59:2 64:17 67:23  
85:13, 18 87:6, 8

88:8 89:11 91:7, 14  
92:4, 7, 10, 13  
**Center** 2:1  
**certain** 43:7  
**certainly** 24:25 53:1  
**certification** 4:4  
**certify** 102:6, 11  
**cetera** 30:7  
**chances** 43:1  
**change** 45:5 99:6, 8,  
10 100:2  
**changed** 22:12 44:4  
45:6  
**changes** 16:12 23:7  
26:11 99:4, 15 101:9  
**characterization**  
48:12 49:18 82:9  
89:22  
**characterize** 70:11,  
19 74:15  
**characterized** 47:9  
48:4  
**charge** 58:19 61:10  
**charges** 60:2, 11  
61:9, 14  
**check** 23:1  
**checked** 78:24  
**Cherry** 16:21  
**chief** 6:14 9:10  
**CIVIL** 1:1 75:24  
**claims** 59:15  
**clarify** 86:17  
**clarifying** 86:5  
**clear** 18:18 35:22  
**client** 18:15 64:16  
66:22 67:20, 22 68:4,  
19 69:20 70:6, 13  
78:18, 19 81:21 82:7,  
21, 22 83:15, 20 84:5  
85:6 86:2 90:6 94:7  
96:20  
**clients** 33:9, 12 70:6  
85:14, 18 86:3, 10, 18  
89:12 90:4, 22 92:11  
**client's** 66:15 71:17  
74:16  
**close** 9:19 68:11  
**cluttering** 93:22  
**code** 22:3

**collaborations** 46:18  
**collect** 75:11  
**column** 99:5  
**come** 24:21 45:13  
75:15  
**comedic** 66:12, 16, 17  
**coming** 24:7 34:25  
35:3 49:21  
**comings** 11:9  
**Commonwealth** 1:1  
102:5  
**communicating** 70:7  
**communications**  
14:17 18:2 21:19  
69:9 78:18 86:2, 3  
**competent** 99:18  
**complained** 50:18, 21  
91:3  
**complaining** 90:4  
91:8  
**Complaint** 77:14, 18  
79:10  
**completely** 70:20  
72:13 94:19  
**concerned** 49:19, 22  
50:1 73:8, 12  
**concerning** 39:10  
49:11  
**concerns** 92:11  
**concluded** 98:20  
**conclusion** 66:10  
86:14 87:14 88:16  
89:15  
**conduct** 38:12 53:14  
68:4, 5, 19 69:14  
91:4, 8  
**conference** 1:1 2:1  
**confidences** 12:21  
18:1 21:19 28:4, 15  
31:10 34:11  
**confident** 70:22  
72:15  
**confirm** 60:13  
**confirmed** 43:6  
**confuse** 7:24  
**confusion** 18:19  
**connection** 16:24  
24:6 36:19 38:12  
95:15 97:22

**consider** 84:15  
**consistent** 45:6  
**constitutes** 75:23  
**contents** 53:10 62:8,  
10, 12, 13 63:4  
**context** 52:9 69:18  
77:12 94:10  
**continue** 46:5, 6  
**continued** 56:3  
**continues** 94:8  
**contract** 10:24  
**contractor** 61:3  
**conversation** 43:10  
65:15 95:21  
**conversations** 46:21  
**copied** 41:4 42:8  
52:25 62:7 64:24  
65:4, 8 74:3 93:3, 10  
94:9  
**correct** 16:3 18:9  
20:25 25:16, 17 27:4,  
25 28:6, 7 29:6, 13  
30:22 31:6 41:3, 6, 7,  
15, 18 47:4, 7 48:13  
52:10 55:7 57:14  
58:9, 15 59:10 60:24  
64:20 68:5, 20 69:15  
72:25 73:1 91:12  
92:5 96:21 101:7  
**correctly** 71:21, 22,  
24 72:6, 9, 22, 23  
73:17 74:24  
**correspond** 10:8  
**couch** 46:15  
**couches** 46:9  
**counsel** 4:3, 18 6:8,  
13 7:18, 23 10:25  
79:2, 4, 6, 9, 24 80:2,  
7, 13 82:1, 4 102:12,  
15  
**counselor** 6:7  
**counterclaim** 76:20  
77:3, 6, 22 78:6, 12,  
25 79:11, 21 80:3, 5  
81:2, 5, 23  
**counterclaims** 76:10  
**couple** 71:19 75:17  
**course** 70:23 72:16  
**Court** 1:1 4:16, 17,  
18, 19 8:25 9:6, 13,

17 17:2 38:3 39:13  
 44:12 72:10 83:11  
 99:22 102:4, 23  
**COZEN** 2:1 80:14  
**crazy** 48:21  
**current** 65:16  
**customers** 35:5, 13

< D >  
**D1** 3:1 52:22  
**D13** 3:1 40:16, 17  
**D18** 3:1 97:21  
**D-18** 97:5  
**D2** 3:1 40:17, 25  
**D21** 61:23  
**D21-23** 3:1  
**D29** 97:23  
**D-29** 3:1  
**Daniel** 2:1 8:19  
 20:19, 21 32:20 43:6  
 53:3 54:2, 8 61:11  
 64:23 70:7 83:19  
**date** 4:9 99:11  
 101:15, 21 102:8  
**dated** 101:6  
**dates** 13:11 47:14, 16  
**Dave** 5:24 22:18  
 51:25 75:1  
**DAVID** 2:1  
**day** 26:20 41:13  
 47:6 50:9  
**days** 12:3 65:18  
 99:23  
**deal** 41:18  
**Dear** 43:6  
**decide** 98:17  
**decided** 81:17  
**decision** 82:2, 3, 6  
**declare** 22:21  
**decline** 96:1  
**Defendant** 2:1  
**Defendants** 1:1  
**define** 90:24  
**definitely** 34:24 35:7  
 37:10  
**definition** 23:1  
**deflating** 71:2 72:20  
**Delaney** 57:14 59:12  
 88:9

**deposition** 1:1 4:11  
 5:7 12:19 22:17  
 29:4 31:13 36:10  
 39:23 85:4 88:20  
 98:20 99:2, 3, 13, 16,  
 23 101:6 102:7, 14  
**depositions** 5:8  
 33:22 95:15  
**deputy** 57:7 75:7  
**DEREK** 2:1  
**describe** 6:11 33:5  
 64:3, 5  
**DESCRIPTION** 3:1  
**despite** 9:9  
**details** 30:18 48:23  
**difference** 65:6  
**different** 7:15 11:9  
 15:1 25:5 39:5  
 45:22 63:22 64:9  
 65:4 66:6, 21 67:17  
 71:1 72:19 79:22  
 82:23 86:5 91:5  
**difficult** 30:6 50:23  
 53:17 92:15  
**dinner** 46:10, 11  
**direct** 90:21  
**directly** 11:4 60:1  
 87:2, 5 89:10 92:2  
**director** 6:15, 24 7:8,  
 10, 16, 25 8:21 9:25  
 10:10 11:3, 8, 18  
 13:8, 10, 15 53:20  
 57:7 61:5 75:7  
**directors** 10:6  
**disagree** 75:4 80:21  
 89:21  
**disclosing** 34:21  
**discouraged** 70:21  
 72:14  
**discrimination** 13:21  
 14:9 15:12, 22 16:24  
 17:7, 10, 14, 23 18:10  
 19:15 20:6, 12 21:10  
 35:12 56:4 59:15  
 60:2 75:21  
**discuss** 28:18 30:12  
 31:12 37:7 38:6  
 57:23 65:16

**discussed** 29:24  
 30:12 31:22 37:13  
 47:3 48:3, 9 57:5  
**discussing** 46:18  
**dispute** 42:10 58:16  
 62:24 64:18 65:12  
 73:4 74:3  
**disputing** 41:11, 12  
**disregarded** 17:21  
**distinction** 64:25  
**DISTRICT** 1:1 4:13  
**divulge** 14:3 28:14  
 77:2  
**divulging** 12:21 18:1  
 28:23 31:9 32:25  
 34:10 54:12 76:16  
**docket** 77:16 78:24  
 79:3, 7, 8  
**docs** 56:22  
**document** 8:5, 7  
 27:10, 11 40:13 41:9  
 56:19 61:22 77:18  
 83:14 84:4  
**documents** 8:3  
 52:15 84:19  
**doing** 26:18 36:9  
 44:14 66:17 67:2, 20,  
 22 68:11 89:20 97:9  
**doubt** 28:7  
**draft** 83:14  
**drank** 46:7  
**drill** 5:9  
**drinking** 46:12  
**driving** 48:21  
**due** 21:9 25:15  
 75:21  
**duly** 4:23  
**duress** 83:10  
**dwalton@cozen.com**  
 2:1

< E >  
**ear** 46:24  
**earlier** 17:25 22:18  
 28:2  
**easier** 7:6 18:4  
**East** 6:7, 8, 12 7:7,  
 11, 14, 20 8:4, 10  
 10:1, 15 11:17 12:2  
 13:3, 6, 20 14:8

15:21 16:2, 7, 22  
 17:5 20:2 21:8  
 32:25 34:6, 16 51:13  
 55:18 77:13 78:14,  
 25 81:22 96:16  
**EASTERN** 1:1 2:1  
 4:10, 12, 13  
**easy** 26:12  
**eat** 68:10  
**editor** 6:14 9:10  
**EEOC** 60:3, 11  
**Efraim** 9:25 10:6  
**Efriam** 8:20, 23, 24  
 9:15  
**either** 10:24 31:6  
 55:3 65:9 85:12  
 87:3 88:8 89:10  
 90:21  
**elevated** 10:23  
**Eleven** 2:1  
**E-mail** 3:1 18:15  
 19:1, 4 27:14 40:8,  
 11, 14, 23 41:3, 5, 14,  
 24 42:7, 9, 15, 22  
 43:18, 22 44:8, 17, 20,  
 21 45:4, 9, 12, 18, 25  
 46:3 47:6, 10 51:4  
 53:11 56:25 57:3, 4,  
 8, 12, 24 58:15 59:13  
 60:9 61:25 62:4, 8,  
 10, 12, 14, 19, 21, 25  
 63:2, 5, 12, 18, 20, 23,  
 25 64:4, 6, 8, 15, 19  
 65:1, 13 67:24 69:10,  
 11, 14, 16, 23 70:3  
 71:10 72:25 74:2, 4,  
 6, 23 87:4, 7, 11 88:8  
 89:10, 11 90:20  
 91:23 92:2, 6, 9, 25  
 93:3, 6, 11 94:1, 5, 9,  
 20 96:8 97:8, 15  
**e-mailed** 50:9  
**e-mails** 19:10 41:13,  
 16 52:14 56:16  
 61:24 65:3 68:16  
 73:7 75:6 85:13, 17  
 87:9 90:1 91:8, 14,  
 16, 18 92:4, 7, 11, 13,  
 15, 22 96:12, 24 97:1

<p><b>e-mail's</b> 94:25  <b>emphatically</b> 96:13  <b>employed</b> 102:12, 15  <b>employee</b> 15:10, 16, 19 16:2, 5 35:1 60:21, 23 61:4 102:15  <b>employees</b> 12:16 16:7, 13, 23 17:6, 12 18:23 35:3, 7 37:17 53:17 56:2 58:24 59:1, 2, 3  <b>employment</b> 10:15 11:12, 13, 16 12:1, 2 17:17 19:16 20:1, 3 75:20  <b>ended</b> 10:15 11:13  <b>engage</b> 82:2  <b>English</b> 70:12  <b>entered</b> 22:24  <b>entire</b> 25:24 37:20 63:20, 23 88:20  <b>E-P-H</b> 9:20  <b>E-P-H-R-A-I-M</b> 9:22  <b>errata</b> 99:5, 9, 11, 16, 21 100:1 101:10  <b>ESQUIRE</b> 2:1  <b>establish</b> 95:4  <b>estimate</b> 16:10 91:16 92:18  <b>et</b> 1:1 4:12 30:7  <b>event</b> 30:18, 21 46:11  <b>Everest</b> 4:15, 17  <b>Everybody</b> 50:14 54:15, 17 60:18 98:13  <b>everybody's</b> 74:1  <b>exactly</b> 25:4 44:1 63:25  <b>EXAMINATION</b> 5:1  <b>examined</b> 4:24  <b>exclaiming</b> 70:22 72:15  <b>Excuse</b> 57:1 96:25  <b>Exhibit</b> 3:1 52:20 61:20 97:6, 19  <b>Exhibits</b> 3:1 40:18 98:15  <b>existence</b> 8:11</p>	<p><b>expert</b> 11:8 70:13 87:22 90:18  <b>explain</b> 57:10 94:22  <b>explained</b> 57:22  <b>expressed</b> 43:10  <b>extent</b> 12:20 14:22 17:25 18:25 23:17 24:24 25:12 27:9 28:2, 22 29:9 31:8 34:9, 21 43:14 44:24 54:11, 25 55:22 69:6 70:8 71:20 74:9 86:15  <b>external</b> 6:16 7:13  <b>extremely</b> 71:2 72:20    <b>&lt; F &gt;</b>  <b>face</b> 22:18  <b>fact</b> 9:9 24:14 35:17 59:22 76:14 86:14 87:19 88:15, 21 89:15 90:17  <b>fact-based</b> 90:25  <b>facts</b> 88:21  <b>fair</b> 11:11 12:11  <b>familiar</b> 8:7 13:13 57:8, 9 75:10, 23 80:8, 10, 25 81:1, 3, 6, 8, 20, 23, 24  <b>fast</b> 5:11 92:24  <b>faster</b> 71:15  <b>favor</b> 68:9  <b>fed</b> 93:8, 12, 20  <b>feel</b> 46:8 70:22 72:15 86:15  <b>felt</b> 30:5  <b>Fifteen</b> 16:11  <b>filed</b> 60:2, 10 76:11 78:25 84:6, 8  <b>filing</b> 4:4 99:17, 22  <b>financial</b> 58:6  <b>financially</b> 102:16  <b>find</b> 24:12 26:5 70:25 72:18  <b>Find-2</b> 40:18  <b>fine</b> 92:24  <b>finish</b> 24:22, 23 39:16  <b>FINK</b> 1:1 3:1 4:11, 22 5:4 6:3, 5 21:23</p>	<p>40:17 61:23 80:18 97:4, 12 101:3  <b>Fink-1</b> 3:1 40:15, 17, 18  <b>Fink-2</b> 3:1 40:25  <b>Fink-3</b> 3:1 52:20, 23  <b>Fink-4</b> 3:1 61:20, 23  <b>Fink-6</b> 3:1 97:6  <b>Fink-7</b> 3:1 97:19, 21, 23  <b>first</b> 4:23 7:22 9:13 40:11, 14 44:16 56:19 95:3  <b>five</b> 46:3, 5 56:21 59:6, 10, 14, 20 76:1 90:15  <b>foam</b> 43:2  <b>focus</b> 37:20  <b>followed</b> 13:3  <b>Following</b> 46:10 99:9  <b>follows</b> 4:24  <b>foregoing</b> 101:6 102:6  <b>Forget</b> 81:13  <b>forgot</b> 19:13  <b>form</b> 4:5 11:5 12:18 17:24 18:11 21:1 28:1, 19, 21 29:9 30:14 31:7, 23 34:8, 19 37:22 38:13, 22 39:12 41:19, 25 42:16 43:19 44:18 45:1, 16 47:12 48:15 49:4, 8 50:20 51:16 52:17 54:24 55:9 57:15, 21 58:20 59:17 60:4, 15 62:15 63:7 68:21, 24, 25 69:1, 4 71:5, 18 76:12 82:8 83:3 85:15 86:13 87:12 89:18 99:4, 8  <b>forth</b> 58:7 102:9  <b>FORUM</b> 1:1 2:1 4:12 6:7, 9, 12 7:7, 12, 14, 20 8:4, 10 10:1, 15 11:17 12:2 13:3, 6 14:8 15:22 16:3, 7, 23 17:6 20:2 21:8 33:1 34:6, 16</p>	<p>51:13 55:18 69:19 77:13 78:14, 25 81:22 96:16  <b>Forum's</b> 13:20  <b>forward</b> 83:5  <b>foundation</b> 28:22 30:15 31:8 35:16 54:25  <b>four</b> 12:7 59:6  <b>free</b> 86:16  <b>F-R-Y-A-M</b> 9:18  <b>full</b> 6:3 61:2 88:6  <b>full-time</b> 60:21, 24 61:1, 7  <b>fundraising</b> 6:15 58:6  <b>funny</b> 42:18 66:4, 5, 19 88:17  <b>further</b> 57:12 58:3 102:11, 14    <b>&lt; G &gt;</b>  <b>Gabrielle</b> 33:18  <b>games</b> 36:14 42:3  <b>Gannone</b> 2:1 4:15  <b>Gary</b> 60:14, 16, 18 65:18, 19  <b>gender</b> 59:16  <b>general</b> 35:11, 18, 21  <b>generally</b> 71:20 75:23 92:10  <b>gentleman</b> 8:20  <b>Gentlemen</b> 39:13 44:13 83:11  <b>getting</b> 46:9 69:23 80:16 90:16  <b>gist</b> 50:23  <b>give</b> 10:24 12:18 14:23 15:25 18:8 21:17 34:9 39:16 51:12 52:7 62:14 87:20 90:3, 25 94:18 95:24 96:7  <b>given</b> 10:16 11:2 14:11, 14, 19, 21 19:24 33:20 67:4 80:8, 10 81:4, 10 85:8, 10 94:11, 25 96:20 101:8</p>
--	---	--	---

<b>giving</b> 22:13 26:16, 21, 22 27:21 28:3 29:15 39:4 52:9 53:2 62:11 79:18 82:5	50:22 53:12, 13 65:18, 22 68:5, 20 69:15 70:25 72:18 73:8, 12 91:3, 8 92:12 94:7	<b>heard</b> 34:13 70:23 72:17 90:8	<b>impression</b> 39:1, 2, 4, 5
<b>Go</b> 7:2 13:9 25:6 36:1, 3, 4 39:1 42:12 56:20 73:11 76:2 79:19 81:15 89:1 90:7	<b>grew</b> 8:1	<b>held</b> 6:24 7:3, 9 30:12 31:12	<b>inappropriate</b> 36:10 39:8 42:24 43:11 50:19 51:24 66:6, 20 68:5 69:14 93:14 96:5
<b>goes</b> 20:15 26:10 27:20 32:12, 16 60:17	<b>grievances</b> 30:1, 5	<b>he'll</b> 88:21	<b>inappropriately</b> 78:2 93:13
<b>going</b> 5:10, 19, 24 8:9 9:8 12:17, 18 13:11 18:16 19:5 21:17 22:5, 8 23:3, 9 24:8, 12, 20, 23, 25 26:12, 13, 19 27:8 29:3, 8, 14 30:25 33:4 34:9 35:15 38:6 40:1, 12, 15, 16, 17 44:1, 5 45:5, 7 46:12 48:24 50:3 51:23, 25 52:12, 16 55:8 56:19 63:8, 10 64:12, 13 66:10, 21 67:2, 16 68:6, 10 70:14 71:4 74:22 75:25 76:14, 23 77:4, 7 78:7 80:22 81:16 82:14, 18 84:18, 20 89:1, 7 90:2, 10 93:7 95:16	<b>GROUP</b> 2:1	<b>help</b> 18:18 20:14 51:10 53:7 83:14 92:23	<b>include</b> 56:16 88:24
<b>goings</b> 11:9	<b>guess</b> 10:20 13:7 31:2 37:25 85:1	<b>hereinbefore</b> 102:8	<b>included</b> 25:23
<b>goings-on</b> 13:14	<b>guests</b> 46:11	<b>Hill</b> 16:21	<b>includes</b> 59:10
<b>GOLD</b> 2:1 98:19	<b>guy</b> 11:24	<b>hire</b> 10:24 80:14 82:1	<b>Including</b> 50:17
<b>Good</b> 5:4, 5 12:3 70:24 72:17	<b>guys</b> 21:24 22:2 72:11 79:15	<b>hired</b> 7:19, 20, 22 8:16, 18 80:7, 13	<b>incorrect</b> 31:1
<b>goodness</b> 10:2	< H >	<b>hiring</b> 11:19, 24	<b>indecipherable</b> 93:21
<b>gotten</b> 17:19	<b>handbook</b> 15:10, 16, 19	<b>history</b> 96:15	<b>indicates</b> 69:14
<b>grandstand</b> 42:3	<b>hands</b> 38:18 39:7 42:23	<b>hold</b> 21:9 40:15 97:12	<b>indiscretions</b> 43:7, 12
<b>gratuitous</b> 31:1 93:23	<b>hanging</b> 74:21	<b>holds</b> 16:23	<b>inflammatory</b> 83:8 84:3
<b>Gregg</b> 2:1 10:11 19:23, 24 20:2, 9, 25 21:11, 15 27:24 30:1 37:12 38:12 42:23 43:8, 11 46:7, 14, 15, 19, 21 48:13 49:1	<b>happen</b> 39:25 40:1 47:8 51:15, 22	<b>Hollin</b> 8:6	<b>information</b> 34:22 54:12 78:13
	<b>happened</b> 29:19 47:8 51:15, 22	<b>home</b> 16:19	<b>informed</b> 43:11
	<b>happens</b> 59:3	<b>honest</b> 22:14	<b>informing</b> 25:24
	<b>happy</b> 19:9 26:2 27:1 29:20 36:25 57:23 72:7 75:9 95:8	<b>honestly</b> 12:6	<b>in-house</b> 6:13 7:23 82:4
	<b>harass</b> 6:21	<b>hour</b> 16:17 26:17 48:24	<b>inject</b> 84:19
	<b>harassed</b> 29:22	<b>hours</b> 37:25 38:7	<b>injected</b> 87:19
	<b>harasser</b> 28:18, 25 29:6, 12	<b>house</b> 6:8	<b>instruct</b> 24:9 62:16 76:14 83:21, 23
	<b>harassment</b> 12:15 13:2, 6, 21 14:9, 20, 21, 24 15:5, 13, 23 16:25 17:7, 10, 14, 23 18:10 19:16 20:7, 12 21:10 29:25 30:3, 8, 12, 13 31:21 32:8 33:10, 14 34:18, 25 35:5, 12 36:19 37:7, 10 49:21 51:1 56:5 59:16 75:21 96:16	<b>Huh</b> 82:11	<b>instructing</b> 24:17 63:9 69:5 93:13
	<b>hard</b> 37:11 38:15, 21 39:9 48:21 50:3 70:21 72:14	<b>hundred</b> 8:13 14:25 39:5	<b>instruction</b> 12:19 13:24 17:25 21:18 23:17 25:13 26:7 28:12 32:23 34:9, 20 54:11 55:21 56:7 64:10 66:2, 25 68:22 74:8 83:16 93:2 94:4, 13
	<b>hardass</b> 50:22	<b>hundreds</b> 41:13	<b>instructions</b> 25:12, 19 76:13 99:1
	<b>header</b> 27:13	< I >	<b>intending</b> 65:7
	<b>hear</b> 33:22	<b>ID</b> 3:1	<b>intentions</b> 53:15
		<b>idea</b> 22:22 33:21, 22, 25 34:14 43:3 61:11, 15 91:17 92:17, 21 96:22	<b>interested</b> 102:16
		<b>identification</b> 40:19 52:20 61:20 97:6, 19	<b>interesting</b> 6:23
		<b>identified</b> 24:17	<b>interim</b> 17:13
		<b>identify</b> 62:2	<b>intern</b> 43:12
		<b>illegal</b> 83:14	<b>internal</b> 65:17
		<b>imagine</b> 76:15	<b>interview</b> 11:22
		<b>implicate</b> 74:6, 17	
		<b>implication</b> 31:15 68:1 77:5 78:3, 9	
		<b>imply</b> 22:16	
		<b>important</b> 31:21 32:6	

**interviewed** 11:20  
19:23 54:8, 15, 17, 20  
**interviewing** 11:25  
**investigate** 19:15  
20:12, 25 34:17, 24  
**investigated** 34:1  
53:4, 10  
**investigation** 19:19  
53:7 54:3, 6 96:14  
**investigations** 96:11  
**investigative** 20:4  
**invited** 21:15 23:14  
24:2 25:10 27:24  
28:10, 18  
**involve** 84:20  
**involved** 8:2 10:21  
11:19, 24 12:24 13:7  
14:6, 7 18:6 51:14  
54:16 55:17, 24  
60:17 82:4, 6, 11  
83:15 96:14, 22  
**involves** 6:14  
**involving** 20:9 21:10  
59:15 68:5, 20  
**irrelevant** 88:20  
94:20  
**Islamist** 7:15, 25  
**Israel** 43:9  
**Israeli** 9:15  
**issue** 10:23 23:10, 24,  
25 24:16 35:7, 8  
37:10, 13  
**issues** 47:2 51:11  
56:4, 17 78:15 90:22  
91:24, 25 96:10

## &lt; J &gt;

**Jersey** 16:21  
**job** 6:6 20:11 51:10,  
12 70:15, 18 74:15  
**John** 51:25 75:1  
**JONATHAN** 2:1  
**July** 61:6  
**June** 60:9  
**junkie** 53:23  
**jury** 68:17 71:17

## &lt; K &gt;

**K-A-R** 9:10

**Karsh** 8:20, 23, 24  
9:2, 4, 25 10:7  
**K-A-R-S-H** 9:11  
**Kassam** 46:16  
**Keep** 5:14 44:13  
65:9  
**kind** 6:11 17:13  
19:18 61:5  
**Knew** 65:18  
**knife** 43:14 44:24  
**know** 5:6, 9, 17 6:13  
9:19 10:12, 13, 14  
11:23 12:1 14:4, 8,  
17 15:6, 21 16:11, 12,  
15, 22 17:5, 8, 12, 16  
20:14 21:3 23:13  
24:2 31:5 33:19, 20,  
21, 24 34:1, 4 35:9,  
20 36:6 40:22 42:19,  
20 45:7, 20 46:1, 17  
47:19, 23, 24 49:14,  
22 51:9 52:8, 15  
53:25 54:8, 15 55:2,  
6, 11, 16 56:2, 11  
58:21 61:8 63:25  
66:15 67:21 68:6  
71:12, 23 73:8, 12  
74:19 75:19 76:10,  
19 77:2, 6, 11, 21  
78:6, 12, 13 80:12  
81:5, 21 82:12 83:19  
85:6 91:20, 22 92:14  
93:9

**knowing** 60:17, 18  
**knowledge** 11:14  
13:12, 15, 19 14:22  
20:11 21:8 33:11, 15,  
17 56:18 84:22  
88:22, 24 92:3

## &lt; L &gt;

**lack** 28:22 30:15  
31:8 35:16  
**lap** 46:23  
**laughed** 66:18  
**laughing** 66:13  
**LAW** 1:1 2:1  
**lawfare** 6:17, 19, 20  
7:5, 11

**lawyer** 35:25 36:3  
55:12 66:11 88:2, 18,  
19 93:5  
**leading** 80:5  
**Leah** 33:24 43:12  
**learned** 12:22, 23  
59:21 73:14 74:20  
**leave** 46:20  
**Legal** 6:15, 21, 24  
7:8, 10, 16, 17 10:16,  
23 11:2 12:23 13:25  
14:3, 11, 14, 20, 21, 23  
15:25 18:1, 5, 8  
19:24 21:20 23:11,  
19, 22, 24 24:1, 5, 6,  
16, 24 25:15 26:13,  
16, 21, 23 27:21  
28:16, 20 29:15  
32:12, 16 35:7 36:21  
43:16 44:20 47:1  
51:12 52:9 53:2, 11,  
19, 20, 21 54:7 55:23  
56:8 59:21 62:9, 11,  
14 63:4 66:7, 9 69:2,  
18 70:4 74:20 77:12,  
15 79:18 80:8, 11, 16  
81:3, 10 82:3, 5 85:8,  
10 86:14 87:13  
88:15 89:15 90:4, 18  
91:25 94:11, 18, 25  
95:4, 9, 17 96:7, 9  
**legitimate** 62:25  
83:4, 6  
**lesson** 73:14  
**letter** 71:6, 17 72:2, 4  
**letting** 93:9  
**Levy** 2:1  
**Liberty** 2:1  
**lies** 30:24  
**life** 30:19, 21  
**line** 51:24 100:2  
**LinkedIn** 12:9, 11  
**LISA** 1:1 4:12  
17:22 33:13 43:8, 9  
46:15, 22 59:11  
60:10 78:25 81:25  
88:8 97:23  
**literally** 52:13  
**litigation** 84:7

**living** 46:14  
**lodge** 21:17 29:2  
**lodging** 22:14  
**logging** 98:14  
**long** 6:23 7:3 8:10  
31:15 38:6 60:6  
**look** 19:9 26:2 27:2  
52:15, 19 61:23  
78:23 79:8  
**looked** 8:3 40:11, 15  
64:1 79:3, 6  
**looking** 27:12, 13  
28:5 47:16, 20 56:21  
62:7 69:10  
**looks** 27:5 97:16  
98:9  
**loop** 65:10  
**lot** 6:14 15:1 30:1  
37:9 47:1 51:13  
65:4 71:13 87:8  
96:9

## &lt; M &gt;

**maintain** 14:4  
**maintained** 34:2  
**majority** 50:2  
**making** 46:8 64:25  
92:15 99:8  
**male** 58:24 60:23  
**males** 50:17  
**management** 10:21  
11:1 14:12 15:25  
55:25 60:18  
**manager** 18:9, 16  
20:16 60:19  
**managing** 11:8 19:5  
**MARC** 1:1 3:1  
4:11, 22 6:5 21:16  
39:15 48:16 58:8  
70:8 71:8 73:24  
76:2 82:12 83:4  
86:15 91:6 98:17  
101:3  
**Marie** 57:13  
**MARKED** 3:1 40:18,  
25 52:20 61:20 97:6,  
19  
**Market** 2:1



<p><b>Marnie</b> 13:15 20:17, 19 46:16 59:11 65:21</p> <p><b>massive</b> 44:20 53:11</p> <p><b>materials</b> 6:15</p> <p><b>Matt</b> 46:16, 21 65:14</p> <p><b>matter</b> 4:12 10:17 26:23 41:16 53:4 67:17 76:13</p> <p><b>matters</b> 53:13</p> <p><b>Matthew</b> 50:17, 18, 21</p> <p><b>McNulty</b> 33:16 38:18 42:7, 14 56:3 57:13 59:11 60:10 64:19 66:22 67:14 88:9</p> <p><b>mean</b> 18:3 36:12 37:24 44:1 45:21 48:19 51:25 52:12 57:10, 23 64:12 68:6 70:12 71:7, 13, 14 74:1, 25 75:14 78:19, 21 80:21 81:12 84:4, 25 87:16 96:3, 13</p> <p><b>means</b> 53:25 58:6 78:17</p> <p><b>meant</b> 46:8 48:20</p> <p><b>measures</b> 20:4 55:17</p> <p><b>meeting</b> 17:20 21:9, 12, 13, 15 23:15 24:7, 21 25:10, 25 26:5, 20, 24 27:7, 19, 24 28:18 29:19, 21, 25 30:2, 9, 12, 18 31:6, 12, 22 32:7, 11, 21 33:6 36:18 37:4, 6, 11, 14 38:18 39:2 47:5, 9, 11, 22, 24 48:3, 5, 9 49:16, 18 50:3, 9, 11, 19, 24 51:2, 5, 8, 14 52:5, 6 69:21</p> <p><b>MEF</b> 43:12 46:10, 12 65:16 76:11 81:24</p> <p><b>MEF's</b> 35:11, 17, 20</p> <p><b>member</b> 11:21</p> <p><b>memo</b> 25:16, 23 26:1, 3 27:1, 3, 22 28:5 29:7, 13 32:20</p>	<p><b>memory</b> 32:9 41:8 48:4</p> <p><b>men</b> 46:17, 19, 20, 24 59:8</p> <p><b>mentioned</b> 43:13 44:23 46:6</p> <p><b>Merville</b> 33:24 34:3 43:13</p> <p><b>message</b> 22:3</p> <p><b>met</b> 82:21 85:6</p> <p><b>Meyer</b> 13:15 20:17, 19 46:16 56:3 57:13 59:12</p> <p><b>mic</b> 76:3</p> <p><b>Michael</b> 4:15</p> <p><b>MIDDLE</b> 1:1 2:1 4:12 6:7, 8, 12 7:7, 11, 14, 20 8:4, 10 10:1, 15 11:17 12:2 13:3, 6, 20 14:8 15:21 16:2, 7, 22 17:5 20:2 21:8 32:25 34:6, 16 51:12 55:18 77:13 78:14, 25 81:22 96:15</p> <p><b>Mike</b> 2:1</p> <p><b>minutes</b> 45:11 46:4, 6, 19 48:8 76:1</p> <p><b>mischaracterization</b> 30:15 31:24</p> <p><b>misinformed</b> 55:3</p> <p><b>missed</b> 17:3</p> <p><b>misunderstand</b> 78:17</p> <p><b>money</b> 33:20 81:21</p> <p><b>months</b> 75:17</p> <p><b>morning</b> 70:20 72:13</p> <p><b>motions</b> 23:4</p> <p><b>mouth</b> 68:11</p> <p><b>move</b> 48:16 83:5 95:5</p> <p><b>multiple</b> 69:17</p> <p><b>mute</b> 76:3</p> <p>&lt; N &gt;</p> <p><b>name</b> 4:15 5:6 6:3 8:20, 22 9:7, 14, 16 33:22 99:11</p> <p><b>names</b> 59:10</p> <p><b>nature</b> 35:18 84:3</p>	<p><b>necessarily</b> 27:20 41:12 82:3</p> <p><b>need</b> 99:18</p> <p><b>needs</b> 69:6</p> <p><b>neither</b> 102:11</p> <p><b>nerve</b> 93:18</p> <p><b>never</b> 16:15 19:18, 21, 23 20:3, 10 34:13 57:8 79:3 80:9 81:7, 9 84:6 92:2 94:5, 10, 19 95:1</p> <p><b>New</b> 16:21 57:7 75:7</p> <p><b>night</b> 46:10 65:15 73:15 85:1, 3</p> <p><b>Nods</b> 5:14</p> <p><b>Nonresponsive</b> 48:6</p> <p><b>Nope</b> 11:20 19:17, 22, 24 20:10 64:23 96:17</p> <p><b>Notary</b> 1:1 99:18 102:5, 23</p> <p><b>note</b> 5:24</p> <p><b>noted</b> 4:19 6:1 99:9 101:10</p> <p><b>notice</b> 17:19 57:13 58:3</p> <p><b>notified</b> 15:8</p> <p><b>notify</b> 98:4</p> <p><b>notifying</b> 98:2, 3</p> <p><b>November</b> 1:1 4:9 21:9 23:14 36:18 37:3 43:6 47:3, 6, 20, 24 48:1, 3 56:5 101:6</p> <p><b>NUMBER</b> 3:1 4:14 6:10 18:21 55:23, 24 61:23 97:4</p> <p>&lt; O &gt;</p> <p><b>oath</b> 5:12 52:1</p> <p><b>Object</b> 11:5 12:17 18:11 21:1 27:8 28:1, 21 29:8 30:14, 15, 25 31:3, 7, 14, 23 34:8, 19 35:15 37:22 38:13, 22 39:12, 17 41:19, 25 42:16 43:2, 19, 20 44:5, 10, 18 45:1, 16 47:12 48:15</p>	<p>49:4, 8 50:20 51:16 52:17 55:8 58:20 59:17 60:4, 15 62:15 63:7, 8 68:21 71:4, 18 76:12 82:8 85:15 86:13 87:12</p> <p><b>objecting</b> 68:24 69:1, 4 87:18</p> <p><b>objection</b> 13:23 17:24 21:17, 23 22:4, 12, 24 23:7, 16 24:8, 12 25:11, 18 26:6 28:11, 19 32:4, 22 35:19 36:24 44:3 54:10, 21, 24, 25 55:13, 20 56:6 57:15, 20 61:18 64:10 66:1, 24 68:8, 24 73:2, 19 74:7 77:23 82:19 83:3 85:20 86:23 87:21, 25 88:11, 14, 17 89:3, 14, 21 90:8 93:1 94:3, 12</p> <p><b>objections</b> 4:5 5:25 22:14 29:3 45:2 93:15 96:5</p> <p><b>obligated</b> 34:17</p> <p><b>obstructing</b> 36:10</p> <p><b>obviously</b> 55:6, 16 72:3 85:23</p> <p><b>O'CONNOR</b> 2:1 80:15</p> <p><b>offensive</b> 6:21</p> <p><b>office</b> 13:13 16:14, 16, 19 18:6 25:24 60:23, 25 61:2, 6 74:22</p> <p><b>officials</b> 51:13</p> <p><b>Oh</b> 8:12 10:2 23:8</p> <p><b>Okay</b> 5:14, 15, 20 8:2, 9 9:17, 25 11:3 12:14 22:7 26:12 30:23 39:18 40:17, 23 41:1, 11 47:22 48:1 52:18, 22, 24, 25 55:6 57:6 62:6 64:3 70:13 72:2, 8 73:11, 25 75:19 81:13 87:6 89:7 95:8, 23 96:3</p>
--	--	--	---

97:4 98:12  
**old** 73:9, 13  
**once** 87:10, 16 88:5  
 89:2, 9, 17  
**ones** 59:4  
**operations** 65:17  
**opinion** 52:7 74:14,  
 17 87:22  
**opportunities** 17:13  
**opportunity** 17:18  
 95:24 96:2  
**organization** 11:22  
 20:22 34:24 35:22,  
 23  
**original** 99:21  
**outside** 10:25 69:18  
 79:2, 4, 5, 8, 24 80:7,  
 13 82:1, 2  
**overlap** 11:15

< P >

**P.C** 2:1  
**p.m** 1:1 4:10 76:6,  
 8 98:20  
**PAGE** 3:1 100:2  
 101:1  
**Pam** 4:17  
**Pamela** 1:1 102:4, 23  
**paragraph** 44:16  
**part** 7:14 24:15  
 51:10 61:4 62:13, 21  
 63:2, 6, 12  
**particular** 43:22  
 44:20 45:12 62:7  
 74:2 91:9, 15  
**parties** 4:3 102:13  
**part-time** 61:3  
**Patricia** 33:16 38:18  
 57:13 59:11 60:10  
 66:22 88:9  
**Patrician** 42:7  
**pay** 71:23 72:1  
**paying** 72:3  
**pending** 31:3 51:18  
**Penn** 2:1  
**PENNSYLVANIA**  
 1:1 2:1 4:14 102:6  
**people** 6:16, 22  
 11:22 30:5 71:12

78:13  
**percent** 8:13 14:25  
**perfectly** 22:25  
**perform** 96:11  
**performed** 19:18  
**performing** 54:2  
**period** 91:13  
**permission** 96:20  
 98:8  
**person** 11:1 20:24  
 65:7, 8 88:18  
**personal** 88:22, 23  
**personally** 56:13  
**personnel** 13:8, 10,  
 15 14:13 15:25  
 20:15 55:24 96:23  
**pervious** 24:4  
**Philadelphia** 2:1  
 16:13  
**phone** 65:14  
**pillow** 43:15 44:25  
**Pipes** 2:1 8:19  
 20:19, 22 32:20 51:4  
 53:3 54:2, 8 61:11  
 64:22, 23 70:7 83:19  
 84:5, 17 85:7, 8, 10  
**Place** 2:1 8:15  
 17:16 21:23 102:8  
**plain** 70:12  
**Plaintiff** 1:1 2:1  
**play** 36:13 42:3  
**pleasantries** 65:16  
**please** 4:20 6:3  
 8:22 19:13 44:14  
 58:3 64:3 72:10, 11  
**plenty** 94:22 95:3  
**PLLC** 2:1  
**point** 18:17 46:20  
 62:19  
**policies** 35:18  
**policy** 13:5, 20, 22  
 14:5, 9, 10, 18, 20, 22,  
 24 15:5, 8, 12, 22  
 35:12, 21  
**political** 98:2  
**poor** 9:9  
**poorly** 70:22 72:15  
**position** 6:24 7:4  
 11:17 20:14, 24

53:18  
**positions** 7:9  
**positively** 96:18, 19  
**positivity** 70:24  
 72:17  
**possible** 29:9 36:12  
 46:18 61:13  
**possibly** 11:25 76:16  
 95:2  
**Pratt** 1:1 4:17  
 102:4, 23  
**predated** 15:2  
**PRESENT** 2:1  
 21:13, 14 37:3 38:11  
 53:12, 13, 22  
**presented** 12:16  
 34:18  
**president** 20:22 21:5  
 53:20  
**prevent** 13:20 14:9  
 15:5, 12, 22 35:12  
**previous** 38:8 43:12,  
 25 44:4 54:5 61:19  
 63:21  
**previously** 37:1 47:9  
**prior** 30:16 31:24  
**privilege** 29:14  
 34:20 55:21 62:17  
 67:17 68:2, 8 69:7  
 70:10 74:8 76:13, 17,  
 24 77:5, 8, 9 78:2, 8,  
 9, 10, 11, 17 84:2, 23  
 85:11, 12, 24 93:2  
**privileged** 34:21  
 80:18 94:16, 17  
 95:19, 20, 24  
**probably** 5:8 15:2  
 29:19 52:12, 13  
 88:24  
**problem** 6:1 74:1  
**procedures** 13:14  
**process** 11:19, 25  
**produced** 41:10  
**Project** 6:16, 23, 24  
 7:10, 11, 13, 17 61:5  
**Projects** 7:8, 15, 16  
**promptly** 99:22  
**proofing** 73:10  
**proofreading** 73:10

**propounded** 101:9  
**provide** 5:19  
**provided** 10:19  
 17:13, 18 24:25  
 99:14, 17  
**provides** 21:23  
**Public** 1:1 77:15, 18  
 99:18 102:5, 23  
**pulled** 46:22  
**put** 8:6 22:11 23:6  
 38:18 42:23 46:21  
 48:22 51:25 53:17  
 58:18 61:10  
**puts** 22:4 44:3  
**putting** 39:7

< Q >

**question** 4:5 5:19,  
 20 7:3 8:10 10:20  
 14:16 17:3 19:12  
 22:11, 19 24:10, 13,  
 18, 23 25:5, 22 29:10,  
 17 30:16 31:2 32:1,  
 3 35:18 36:20 38:10  
 39:16 41:22 42:1, 4,  
 6, 25 44:9 45:21  
 48:1, 2, 16 51:18, 19,  
 21 62:23 63:8, 22  
 64:10 65:23, 24  
 66:21 67:7 68:7  
 70:9 71:14, 16, 21  
 74:11, 13, 22 75:2  
 76:15, 19 77:1, 7, 17,  
 21 78:2, 3, 5, 7 79:20,  
 23 81:17, 19 82:24  
 83:4, 6, 17 84:3, 24  
 85:3, 4, 23 86:5, 8, 18  
 87:13, 17, 20 88:3, 4,  
 6 89:4 90:11, 13  
 91:6, 13 94:2 95:1  
 97:11  
**QUESTIONED** 3:1  
**questioning** 51:24  
**questions** 5:16 24:11  
 27:9 31:13 45:22  
 66:6 80:18, 23 84:18  
 93:16, 24 96:4 98:11,  
 14, 18, 19 101:9  
**quizzing** 8:12

&lt; R &gt;

**Raheem** 46:16**raised** 32:7**rant** 37:11**ranting** 48:24 49:1**read** 5:25 27:1142:11 44:16 45:10,  
11, 13, 15, 18, 24 46:2  
57:3 68:16 71:17, 21,  
22 72:4, 7, 8, 21, 23

73:1, 16 74:23, 24

77:14 79:10, 14, 19

81:7, 9 84:9 92:22,

24 99:2, 3 101:6

**reading** 45:12 53:168:16 70:12 71:6, 17,  
19, 24 72:2, 4, 5, 9**ready** 68:7**real** 13:13**really** 12:5, 24 14:6

16:11 30:6 33:6

48:21 57:10 77:14

**reason** 10:18 41:21,23 61:17 99:5, 10  
100:2**reasons** 20:21 42:7**retained** 3:1**recall** 17:11 48:10

63:3, 20, 23

**receipt** 15:15, 19**receive** 15:10 27:22

60:9 65:11 73:7

85:17 91:23 99:23

**received** 41:6 58:15

64:15 65:1, 12, 14

71:10 72:25 73:18

74:3 90:20 92:2, 7

**receiving** 26:3 43:15,

18 44:3, 8 45:4, 8, 14

46:1, 2 61:24 63:23

69:18 73:3, 6 74:2

89:11

**recess** 76:6**recipient** 87:3 88:8

89:10, 25 90:21

**recognize** 97:25**recollection** 19:7**recollections** 70:3**record** 4:9, 19 5:15

6:4 31:1 35:23

36:11 56:21 68:10

71:7 76:5, 8 77:15,

18 79:19 84:10

93:22 96:4

**recorded** 4:11**refer** 24:4 38:8

43:25 44:4 63:21

**reference** 35:16 46:9**references** 23:4**referred** 58:10**referring** 24:6 53:9

80:14

**refusal** 24:13**refuse** 79:7**refusing** 78:1 81:19  
96:4**regard** 6:25 13:20

18:5 31:13 35:11

96:12 98:15

**regarding** 94:8**regardless** 23:2 45:8**related** 10:22 56:4

90:23 91:24 102:12

**relates** 91:13**relating** 92:11**relation** 93:15**relationship** 34:3**relative** 102:15**relevant** 94:22, 25**remarks** 93:23**remember** 5:18 10:4

11:2 12:5, 6 13:16

14:25 15:9, 14, 17, 18,

20 17:21, 22 19:9

21:12 26:1, 3 29:19

30:2, 4, 10, 11, 17

33:6 37:9, 15 38:19

39:11 41:4, 12, 21, 23

42:7, 9 43:15, 17, 18,

21, 24 44:2, 8, 17, 19,

25 45:4, 8, 10, 12, 14

46:1, 2, 25 47:8, 13

48:22, 23, 25 49:21,

24 50:4, 6, 8, 10, 12,

13, 24 51:3, 6 52:6, 7,

13, 16 53:1, 2, 16, 19,

24 57:4 58:16 60:12

61:24 62:7, 8, 10, 11,

21 63:13, 18 64:8

67:11 69:17, 23 73:3,

6 74:2 87:8 91:9, 15,

22 92:16 97:24

**remembered** 69:25**remembers** 42:14, 20

43:1, 4

**reminiscent** 71:1

72:19

**remote** 13:13**rendered** 24:16**repeat** 14:19 29:10,

23 35:25 36:3, 25

48:8 54:5 61:8, 19

67:7, 11 86:7 88:6

89:4, 7

**repeated** 89:6**repeatedly** 69:24**repeating** 37:23 38:1**report** 16:24 17:6, 9,

14, 18 19:1, 11, 13, 14

20:6 49:11 51:1

56:4 57:14 58:3

65:24 66:23 67:14

68:19 86:11

**reported** 13:2 17:23

18:10 52:3 56:11, 17

85:14, 18 86:19

88:10 89:12 90:22

92:11

**Reporter** 1:1 4:17,

20 8:25 9:6, 13, 17

17:2 38:3 39:13

44:12 72:10 83:11

99:22 102:4, 23

**Reporting** 4:16, 18

13:5 68:4

**reports** 20:12 21:9

55:19 57:24 58:7

75:11, 21 86:21

91:24

**representation** 12:24

59:21 74:20

**Representing** 2:1**reputation** 94:8**require** 65:10 99:22**requires** 87:20**reserve** 5:25**reserved** 4:6**respect** 11:21 21:18

34:20 55:21 74:8

76:13 85:24 88:15

89:15 93:2

**respective** 4:3**respond** 65:8**responded** 48:7 62:5**responding** 24:23

48:7 62:3

**response** 52:10

54:23 61:9, 13, 25

65:10 98:7

**responsibilities** 7:18**responsive** 5:18**retail** 35:13**retaliation** 55:7, 15,

19 65:25 66:23

67:15 74:6, 18 75:19,

24 85:14, 18 86:11,

22 87:19 88:10, 24

89:12 90:4, 23, 25

**Return** 99:21**reviewed** 79:20 80:4,

6, 9

**RICO** 83:20 84:6, 8,  
11**ridiculous** 90:16

93:23

**RIESER** 2:1**right** 5:22 12:12, 13

25:21 36:17 37:4

40:8, 23 41:21 43:1,

24 44:12, 13 45:19

47:11, 16 50:13

52:16 57:7 58:12

59:6, 7, 12, 16 61:7,

22 64:16 65:11, 22

66:17 71:2, 11 72:23

73:22 75:14, 22 76:7

77:15, 16 78:9, 21

79:19 85:6, 12 86:6

88:23 91:12 92:8

97:15, 17 98:5, 8

99:3

**Rights** 75:24**ring** 44:17**Robinson** 96:21 97:2,  
23**role** 7:24**roles** 6:10, 12

<p><b>Roman</b> 2:1 10:7 11:4, 11, 16 19:23, 24 20:9, 25 21:11, 15 23:14 24:20 25:10 27:24 28:25 29:6, 12, 21 30:24 31:5 34:2 37:12 42:23 43:8 49:1 50:22 53:12, 14 54:9, 19 68:5, 20 69:15 92:12 94:7 <b>Roman's</b> 12:2 20:3 30:21 38:12 50:18 59:15 91:4, 8 <b>room</b> 46:14, 17, 20, 24 <b>rules</b> 22:17 99:22 <b>run</b> 5:10 <b>running</b> 80:3</p> <p>&lt; S &gt; <b>saw</b> 8:6 57:8 94:5, 10 <b>saying</b> 37:19 49:25 50:14 70:25 72:18 75:7 80:9 <b>says</b> 12:9, 11 45:9 53:3 57:6, 12, 17 58:3 59:13 63:25 64:4 84:5 94:7 <b>scared</b> 43:13 44:23 <b>screen</b> 28:6 76:3 <b>scroll</b> 27:15 40:9, 21 52:24 62:3, 6 <b>sealing</b> 4:4 <b>second</b> 22:10 <b>secure</b> 10:25 <b>see</b> 8:5 10:8 40:3, 8, 13 41:4 42:9 53:5 58:12 62:6 64:17 72:5 74:2 80:24 90:25 94:1 97:9 <b>seen</b> 17:20 93:6 94:19 95:1 <b>seminal</b> 30:18, 21 <b>send</b> 18:15, 25 19:4, 13, 14 56:25 65:2, 3, 7 96:24 97:1, 15 <b>sending</b> 19:10, 11 42:14 75:6 97:24 <b>sends</b> 65:2 <b>senior</b> 11:21</p>	<p><b>sent</b> 19:10 29:13 32:20 42:7 47:6, 10 57:24 64:15, 19, 22, 23 69:20 75:16 95:10, 15 <b>separate</b> 7:17 <b>serious</b> 37:13 38:11, 20, 23 48:11 49:3, 6, 9 <b>session</b> 37:11 <b>set</b> 102:8 <b>SETH</b> 2:1 5:6, 23 22:5 23:10 26:13 27:10 29:2 33:22 39:21 40:12 42:2 45:5, 20 56:20 66:10 68:9 73:16 85:3 90:2 93:7 96:13 <b>seth@dereksmithlaw.c</b> <b>om</b> 2:1 <b>sex</b> 59:16 <b>sexual</b> 12:15 13:2, 5 14:20, 21, 23 15:5 29:25 30:3, 8, 11, 12 31:20 32:8 33:10, 14 34:2, 17, 25 35:5 36:19 37:7, 9 49:20 51:1 96:16 <b>sexually</b> 29:22 37:16 39:7 42:24 <b>sgold@discrimlaw.net</b> 2:1 <b>S-H</b> 9:10 <b>Shargel</b> 10:9 11:3 <b>Shargel's</b> 10:14 11:12 <b>sheet</b> 99:5, 10, 11, 16, 21 100:1 101:10 <b>shortly</b> 10:10 <b>show</b> 19:8 26:1 27:1, 3, 11 40:22, 24 52:18 56:19 60:12 78:22 87:11 91:20 92:6, 9, 21 <b>showing</b> 41:9 <b>shrugs</b> 5:15 <b>Sid</b> 98:17 <b>SIDNEY</b> 2:1 <b>sign</b> 5:25 99:10, 13, 17</p>	<p><b>signature</b> 99:19 101:1, 13 <b>Significant</b> 38:25 39:9 <b>signing</b> 99:15 <b>simple</b> 14:15 92:14 <b>single</b> 18:4 22:23 <b>sit</b> 23:3 84:25 85:2 <b>Sitting</b> 37:8 46:15 <b>slander</b> 94:8 <b>smartass</b> 36:8 <b>SMITH</b> 2:1 <b>social</b> 53:23 <b>somebody</b> 39:8 98:5 <b>sorry</b> 7:1, 20 9:1, 6 10:14 12:5 13:9 17:2 29:23 38:3 39:18 <b>sort</b> 22:3 <b>sorts</b> 91:25 <b>sound</b> 12:12 <b>sounds</b> 12:13 <b>space</b> 99:14, 17 <b>speaking</b> 65:17 93:15 <b>spearheading</b> 21:3, 5 <b>specialist</b> 4:16 <b>specific</b> 42:6 <b>Specifically</b> 7:5 24:9 53:9 58:19 70:1 <b>speculate</b> 61:16 <b>spell</b> 9:8 <b>spelled</b> 9:12, 18 <b>speller</b> 9:9 <b>spent</b> 50:2 <b>spew</b> 94:8 <b>spoke</b> 19:2 <b>spoken</b> 33:12 <b>sponsors</b> 7:12 <b>spring</b> 85:19 86:11 88:13 89:12 90:21 91:11 92:12 <b>staff</b> 46:13 59:9 61:4 <b>staffer</b> 60:22 <b>staffers</b> 59:23 <b>Standard</b> 4:10 <b>stands</b> 78:5 79:20 <b>staring</b> 46:3</p>	<p><b>started</b> 12:7, 12, 14 13:16, 17 15:4, 7 22:11 60:6 65:15 <b>state</b> 6:3 <b>statement</b> 31:1 <b>statements</b> 19:21 58:7 <b>STATES</b> 1:1 4:13 <b>Station</b> 83:1 85:7 <b>staying</b> 46:14 <b>stenographic</b> 4:19 <b>step</b> 29:3 <b>stepping</b> 5:24 <b>Steven</b> 2:1 <b>stipulated</b> 4:2 <b>stole</b> 81:21 <b>Stop</b> 40:23 84:7 93:22 <b>store</b> 35:14 <b>straight</b> 31:25 36:12, 15 42:2 <b>Street</b> 2:1 83:1 85:7 <b>strike</b> 8:2 13:3 57:2 61:1 <b>strong</b> 30:5 <b>stuff</b> 52:11 97:22 <b>Subject</b> 23:17 24:15 25:12 35:19 55:21 86:15 89:1 99:15 <b>subjects</b> 75:20 <b>substance</b> 99:4, 9 <b>substantive</b> 80:17 <b>suggest</b> 95:23 <b>suggesting</b> 23:6 <b>suggestion</b> 23:8 <b>Suite</b> 2:1 <b>summer</b> 18:21, 23 57:11 60:6 85:19 86:11 88:13 89:13 90:22 91:12 92:12 <b>super</b> 5:10 <b>supervise</b> 58:8, 23, 25 59:4 <b>supervised</b> 18:22 <b>supervising</b> 97:25 <b>supervision</b> 18:25 <b>supervisor</b> 39:7 75:13 <b>supposed</b> 22:4 42:20 73:10</p>
--	---	--	--

**sure** 8:13 10:10  
 11:6 16:9 18:20  
 20:1 21:2 55:18  
 61:2, 3 79:14 81:11,  
 13 86:10 91:3, 7  
 92:23  
**swear** 4:20  
**sworn** 4:23  
  
 < T >  
**table** 51:19  
**take** 5:7 38:7 56:21  
 75:25  
**taken** 1:1 20:3  
 45:18, 24 76:6 102:8,  
 14  
**takes** 38:7 53:13  
**talk** 14:16 31:16  
 33:9, 13 37:24, 25  
 75:9  
**talked** 31:16  
**talking** 22:1, 22 35:9,  
 10, 11, 17 50:8 86:1,  
 2 91:11 92:1 95:14  
**talks** 39:6, 8 54:2  
**tasks** 18:22  
**tell** 8:18 18:16  
 27:15 39:19, 21 40:5  
 54:16 56:12 68:23  
 72:8 77:9 87:24  
 90:6, 9 95:16  
**telling** 19:4 34:13  
 49:19 67:8 68:25  
**ten** 44:9 48:8 92:20  
**tens** 52:13  
**terminated** 10:20  
**termination** 10:18  
**terms** 10:25  
**territory** 82:5  
**test** 78:10  
**testified** 4:24 31:5  
 54:19 65:19  
**testify** 72:21 73:16  
 88:21 91:21  
**testifying** 45:14, 25  
**testimony** 30:16  
 31:22, 24 32:6 36:17  
 99:14  
**text** 43:10

**Thank** 9:17 19:1, 10  
 75:11 98:13, 19  
**thanked** 57:25  
**theory** 78:11  
**thing** 18:4 35:25  
 60:6 69:21  
**things** 8:12 15:1  
 68:15 70:24 71:1, 13  
 72:17, 19 73:14  
 86:19  
**think** 5:7 7:7 9:11,  
 21 10:9 11:7, 23  
 12:9 28:9, 17 31:20  
 34:16, 23 39:6 42:12,  
 14 51:7 66:15 67:25  
 72:1 75:15 97:5  
**thinking** 55:3  
**thinks** 70:22 72:15  
**thousands** 41:16  
 52:14 65:3 73:7  
**threat** 23:5  
**threaten** 83:20  
**threatening** 84:6  
**threats** 23:3  
**three** 12:7 16:16  
 29:22 39:3 45:11  
 46:17, 19 59:6  
**time** 4:6, 10 7:9  
 8:21 11:12 13:17  
 16:17 20:17 21:22,  
 23 22:1, 3, 10 23:6  
 29:16 37:20 39:17,  
 22 44:14 45:18, 24  
 50:7 59:25 68:15  
 72:5 73:24 75:13  
 88:7 89:25 91:12  
**times** 16:17 40:4, 5  
 44:9 45:10 66:6  
 69:17 86:10, 21 89:6  
 93:8  
**title** 10:10 11:7  
 55:15 57:9 75:10, 24  
**titles** 10:8 11:9  
**today** 4:17, 18 5:7  
 6:6 8:3 15:22 16:14  
 20:3 31:13 36:17  
 45:19, 25 72:21  
**Today's** 4:9  
**told** 27:10 33:4  
 69:12, 17, 23 73:15

77:10 78:13 88:2  
 93:5 96:13  
**tolerate** 22:9  
**Tommy** 96:21 97:2,  
 23  
**ton** 52:11  
**top** 40:10 62:6  
**topic** 44:21  
**topics** 70:3  
**totally** 93:14  
**train** 16:23  
**trained** 17:9  
**trainings** 16:23  
**trains** 17:6  
**transcript** 102:7  
**transcription** 101:8  
**trial** 4:6  
**tried** 68:19  
**trip** 43:8  
**true** 60:1 94:21  
 101:7 102:6  
**truly** 73:13  
**try** 9:8 18:4 22:19  
 34:11  
**trying** 36:7, 12, 13  
 42:2, 3 46:20 66:22  
 92:23  
**Tuesday** 1:1 4:9  
 101:6  
**turn** 50:14, 16  
**turned** 98:4, 7  
**twelfth** 73:24  
**two** 7:8 10:5 12:7  
 16:16, 17 37:17, 24,  
 25 38:7 39:3 43:9  
 45:22 55:24 59:6  
 65:18 91:19  
**two-and-half** 39:2  
**tying** 67:14  
  
 < U >  
**Uh-huh** 44:23 53:6  
 58:14  
**uncomfortable** 43:14  
 44:24 46:8  
**understand** 5:12  
 23:10 32:1 36:5  
 55:4  
**understanding** 32:13,

21 51:10  
**understood** 5:20  
**UNITED** 1:1 4:13  
**use** 6:21 38:23 49:8  
 68:14 72:5  
  
 < V >  
**vaguely** 30:10, 11  
**valid** 22:14  
**vast** 50:2  
**veiled** 23:3, 5  
**verbal** 5:14  
**versus** 4:12 81:24  
**victims** 6:17, 18 7:5  
**video** 1:1 2:1 4:11,  
 16  
**Videographer** 2:1  
 4:8 76:4, 7  
**Videotaped** 1:1  
**violate** 67:17 69:6  
 84:23  
**violating** 22:17 70:9  
**visit** 16:16  
**vs** 1:1  
  
 < W >  
**W-2** 16:5  
**Wait** 9:6 64:12  
 67:3 68:6  
**waiting** 68:12  
**waived** 4:4  
**WALTON** 2:1 75:1  
**want** 5:17 19:8  
 23:1 25:5 27:1, 9  
 29:18 37:24 40:21,  
 22, 24 41:1 52:19  
 54:5 56:20 64:5  
 65:9 72:4 73:24  
 78:23 79:19 81:11  
 84:13 85:3 86:17  
 88:3 90:9 95:8  
 98:18  
**wanted** 73:13  
**Washington** 7:16  
**Watch** 7:15, 25 39:25  
**watched** 5:8  
**way** 10:21 12:25  
 14:7 39:8 42:24  
 51:14 89:10 90:20



**ways** 39:5 66:21  
 67:17 73:9, 13 90:15  
 94:22  
**website** 60:19  
**week** 60:11 65:3  
**weekly** 18:22 19:1,  
 11, 13, 14 57:24 58:7  
 75:11 98:1  
**weeks** 18:21, 23  
**weird** 46:7  
**welcome** 92:21  
**Well** 7:6 13:2 18:8  
 23:2 27:6 32:13  
 35:6, 8 36:11, 22  
 38:20 41:9 42:12, 22  
 47:16, 20, 22 48:11,  
 20 50:16 51:7 52:22  
 54:19 57:12 59:24  
 63:6, 7, 12 66:10  
 67:10 71:23 72:1, 2  
 74:17, 23, 25 75:6  
 78:24 79:20 80:23  
 85:9, 11, 17 88:23  
 91:21, 23 92:4 93:12  
 94:7, 15 95:14 96:24  
 98:4  
**went** 25:24 33:6  
 36:21 46:13 86:18  
 98:1  
**we're** 5:6, 24 13:11  
 21:25 22:8 35:13  
 38:2, 6 39:22, 24  
 44:1 47:5, 16, 20  
 68:6, 10 69:10 89:1  
 91:11  
**we've** 71:12  
**whispering** 46:23  
**WILLIAM** 2:1  
**wisely** 68:15  
**WITNESS** 3:1 4:20  
 9:2, 8, 15, 20, 23 11:6  
 12:18, 22 13:25 18:3,  
 13 19:21 21:2, 20, 25  
 22:13, 21 23:9, 19  
 26:8 28:5, 20 29:10  
 30:17 31:18, 25  
 32:16, 24 33:5 34:12,  
 23 35:20 36:11, 25  
 37:23 38:14 39:18  
 42:1 43:3, 21 44:19

47:13 50:21 52:18  
 54:14 55:2, 23 56:8  
 57:18, 22 58:21 60:5,  
 16 61:19 62:24  
 63:10, 16 66:12  
 68:14 69:2 70:11, 13  
 71:6, 22 73:3, 25  
 74:10, 21 76:23 78:1  
 79:24 82:14 83:21  
 84:18 86:7, 17, 24  
 88:18, 21 89:4 90:10,  
 18 91:7 93:10, 14  
 94:5 98:12, 18 99:1,  
 18, 19 102:7  
**WITNESSED** 101:19  
**Wolson** 22:25  
**woman** 96:15  
**women** 29:22 58:19  
 59:7, 10, 14, 20 61:10  
**word** 38:23 49:9  
 87:19  
**words** 71:19  
**work** 8:1, 7 13:12,  
 13 16:13, 18, 19 19:5  
 22:6 30:6 46:18  
 50:15, 23 58:8, 23, 25  
 70:20, 24 72:13, 18  
 94:8 96:20 97:1  
**worked** 16:15 22:25  
 61:6  
**working** 15:4, 6  
 70:21 72:14  
**workplace** 13:21  
 14:10 15:13, 23  
 16:25 17:7, 10, 15, 23  
 18:10 19:16 20:7, 13  
 21:10 56:5 75:22  
**works** 60:23, 25 61:2  
**world** 6:17  
**worth** 31:2  
**wrap** 46:21 85:4  
**wrong** 55:3 71:19  
 97:12  
**wrongful** 68:4  
  
**< Y >**  
**Yeah** 7:13 13:19  
 18:13 20:20 21:4, 22  
 22:2 24:5 26:8 28:5  
 32:9, 10 33:2 35:4,

25 39:19 41:17  
 42:19 50:5 51:20, 23  
 56:14 57:22 64:8  
 75:18 83:9 85:21  
 86:10 87:1 88:7  
 92:1 93:5, 17 96:9,  
 19 97:24 98:9  
**year** 7:8 10:4 12:14  
 16:17  
**year-and-a-half** 10:5  
**years** 10:5 12:7, 8  
 39:3  
**Yep** 5:21 6:10 8:17  
 9:5 12:13 20:18, 23  
 27:5 49:2 58:5, 10  
**yes-or-no** 14:15  
 74:13 76:19 77:1  
**yesterday** 53:4 54:3  
**Yonchek** 57:14  
 59:12 88:9  
  
**< Z >**  
**zero** 87:5

**WORD LIST**

<b>&lt; 1 &gt;</b>	<b>&lt; 5 &gt;</b>	<b>Airbnb (1)</b>	<b>awful (1)</b>
<b>11-4-2018 (1)</b>	<b>5 (2)</b>	<b>al (2)</b>	<b>&lt; B &gt;</b>
<b>12 (1)</b>	<b>5:19 (1)</b>	<b>allegation (3)</b>	<b>back (11)</b>
<b>15 (1)</b>	<b>515 (1)</b>	<b>allegations (15)</b>	<b>backfire (2)</b>
<b>1650 (1)</b>	<b>52 (1)</b>	<b>allege (1)</b>	<b>backfired (1)</b>
<b>1835 (2)</b>	<b>5th (10)</b>	<b>alleged (9)</b>	<b>bad (8)</b>
<b>19103 (3)</b>	<b>&lt; 6 &gt;</b>	<b>alleging (1)</b>	<b>Ballpark (2)</b>
<b>1964 (1)</b>	<b>6 (2)</b>	<b>allowed (1)</b>	<b>bankrupt (1)</b>
<b>1994 (2)</b>	<b>61 (1)</b>	<b>amount (2)</b>	<b>bar (2)</b>
<b>1st (1)</b>	<b>&lt; 7 &gt;</b>	<b>Amy (4)</b>	<b>BARBOUNIS (12)</b>
<b>&lt; 2 &gt;</b>	<b>7 (2)</b>	<b>answer (133)</b>	<b>Barbounis's (1)</b>
<b>2 (1)</b>	<b>7:28 (1)</b>	<b>answered (23)</b>	<b>barely (1)</b>
<b>2:19-cv-05030 (1)</b>	<b>&lt; 9 &gt;</b>	<b>answering (2)</b>	<b>based (14)</b>
<b>20 (3)</b>	<b>97 (2)</b>	<b>answers (3)</b>	<b>basically (1)</b>
<b>2012 (4)</b>	<b>&lt; A &gt;</b>	<b>answer's (2)</b>	<b>basis (4)</b>
<b>2015 (4)</b>	<b>abruptly (1)</b>	<b>anybody (1)</b>	<b>Bates-stamped (1)</b>
<b>2016 (1)</b>	<b>absolutely (5)</b>	<b>apologize (1)</b>	<b>began (5)</b>
<b>2018 (8)</b>	<b>absurd (1)</b>	<b>apparently (2)</b>	<b>beginning (3)</b>
<b>2019 (17)</b>	<b>acceptable (1)</b>	<b>appear (1)</b>	<b>behavior (1)</b>
<b>2020 (3)</b>	<b>accurate (1)</b>	<b>APPEARANCES (1)</b>	<b>believe (16)</b>
<b>21 (1)</b>	<b>accusations (1)</b>	<b>appearing (1)</b>	<b>believed (1)</b>
<b>215)391-4790 (1)</b>	<b>acknowledge (3)</b>	<b>appears (1)</b>	<b>bells (1)</b>
<b>215)569-1999 (1)</b>	<b>acknowledged (2)</b>	<b>appropriate (4)</b>	<b>Bennett (5)</b>
<b>215)665-2000 (1)</b>	<b>acknowledges (1)</b>	<b>April (5)</b>	<b>best (6)</b>
<b>219-cv-05030 (1)</b>	<b>Act (1)</b>	<b>argue (1)</b>	<b>better (1)</b>
<b>23 (1)</b>	<b>acted (1)</b>	<b>arm (1)</b>	<b>biggest (1)</b>
<b>23rd (4)</b>	<b>acting (2)</b>	<b>asked (20)</b>	<b>Bill (1)</b>
<b>24 (2)</b>	<b>ACTION (5)</b>	<b>asking (55)</b>	<b>blackmail (2)</b>
<b>24th (1)</b>	<b>activities (3)</b>	<b>assaulted (1)</b>	<b>blackmailed (1)</b>
<b>2950 (1)</b>	<b>addition (1)</b>	<b>assert (5)</b>	<b>blackmails (1)</b>
<b>29th (1)</b>	<b>additional (1)</b>	<b>asserting (2)</b>	<b>block (1)</b>
<b>&lt; 3 &gt;</b>	<b>addressed (1)</b>	<b>assign (1)</b>	<b>Bloom (1)</b>
<b>3:03 (2)</b>	<b>addresses (1)</b>	<b>assists (1)</b>	<b>blur (2)</b>
<b>30 (2)</b>	<b>administration (2)</b>	<b>ASSOCIATES (1)</b>	<b>boss (19)</b>
<b>30th (2)</b>	<b>administrative (7)</b>	<b>assume (10)</b>	<b>bottom (1)</b>
<b>&lt; 4 &gt;</b>	<b>adult (1)</b>	<b>assumption (1)</b>	<b>bounds (2)</b>
<b>4 (1)</b>	<b>advance (1)</b>	<b>attached (2)</b>	<b>Brady (4)</b>
<b>4:21 (2)</b>	<b>adverse (1)</b>	<b>attempted (1)</b>	<b>break (1)</b>
<b>4:32 (2)</b>	<b>advice (82)</b>	<b>attend (1)</b>	<b>briefly (1)</b>
<b>40 (2)</b>	<b>advised (3)</b>	<b>attended (1)</b>	<b>bring (1)</b>
<b>4-23 (1)</b>	<b>afternoon (2)</b>	<b>attendees (1)</b>	<b>broad (1)</b>
<b>447 (1)</b>	<b>ago (3)</b>	<b>attention (3)</b>	<b>brought (2)</b>
<b>4th (1)</b>	<b>agreed (2)</b>	<b>Attorney (6)</b>	<b>building (1)</b>
	<b>ahead (14)</b>	<b>attorney-client (11)</b>	<b>Bylaws (2)</b>
	<b>AIPAC (4)</b>	<b>authority (2)</b>	<b>&lt; C &gt;</b>
		<b>avoid (1)</b>	<b>call (3)</b>
		<b>aware (15)</b>	<b>called (7)</b>
		<b>awareness (1)</b>	

calling (1)	Commonwealth (2)	current (1)	director (19)
calls (3)	communicating (1)	customers (2)	directors (1)
Campus (1)	communications (7)		disagree (3)
cancel (1)	competent (1)	< D >	disclosing (1)
carefully (2)	complained (3)	D1 (2)	discouraged (2)
CARSON (208)	complaining (2)	D13 (4)	discrimination (19)
Case (12)	Complaint (3)	D18 (2)	discuss (7)
categorization (2)	completely (3)	D-18 (1)	discussed (8)
Catriona (3)	concerned (5)	D2 (3)	discussing (1)
CAVALIER (178)	concerning (2)	D21 (1)	dispute (8)
cc (2)	concerns (1)	D21-23 (1)	disputing (2)
cc'd (18)	concluded (1)	D29 (1)	disregarded (1)
Center (1)	conclusion (5)	D-29 (1)	distinction (1)
certain (1)	conduct (8)	Daniel (13)	DISTRICT (4)
certainly (2)	conference (5)	date (5)	divulge (3)
certification (1)	confidences (7)	dated (1)	divulging (8)
certify (2)	confident (2)	dates (3)	docket (5)
cetera (3)	confirm (1)	Dave (4)	docs (1)
chances (1)	confirmed (1)	DAVID (1)	document (11)
change (5)	confuse (1)	day (4)	documents (3)
changed (3)	confusion (1)	days (3)	doing (10)
changes (6)	connection (6)	deal (1)	doubt (2)
characterization (4)	consider (1)	Dear (1)	draft (1)
characterize (3)	consistent (1)	decide (1)	drank (1)
characterized (2)	constitutes (1)	decided (1)	drill (1)
charge (2)	contents (6)	decision (3)	drinking (1)
charges (4)	context (4)	declare (1)	driving (1)
check (1)	continue (2)	decline (1)	due (3)
checked (1)	continued (1)	Defendant (2)	duly (1)
Cherry (1)	continues (1)	Defendants (1)	duress (1)
chief (2)	contract (1)	define (1)	dwalton@cozen.com
CIVIL (2)	contractor (1)	definitely (3)	(1)
claims (1)	conversation (3)	definition (1)	
clarify (1)	conversations (1)	deflating (2)	< E >
clarifying (1)	copied (11)	Delaney (3)	ear (1)
clear (2)	correct (38)	deposition (20)	earlier (3)
client (24)	correctly (9)	depositions (3)	easier (2)
clients (12)	correspond (1)	deputy (2)	East (35)
client's (4)	couch (1)	DEREK (1)	EASTERN (6)
close (2)	couches (1)	describe (4)	easy (1)
cluttering (1)	counsel (19)	DESCRIPTION (1)	eat (1)
code (1)	counselor (1)	despite (1)	editor (2)
collaborations (1)	counterclaim (14)	details (2)	EEOC (2)
collect (1)	counterclaims (1)	difference (1)	Efraim (2)
column (1)	couple (2)	different (18)	Efriam (4)
come (3)	course (2)	difficult (4)	either (9)
comedic (3)	Court (19)	dinner (2)	elevated (1)
coming (4)	COZEN (2)	direct (1)	Eleven (1)
comings (1)	crazy (1)	directly (6)	E-mail (108)

<b>e-mailed</b> (1)	<b>favor</b> (1)	<b>Gary</b> (5)	<b>he'll</b> (1)
<b>e-mails</b> (27)	<b>fed</b> (3)	<b>gender</b> (1)	<b>help</b> (6)
<b>e-mail's</b> (1)	<b>feel</b> (4)	<b>general</b> (3)	<b>hereinbefore</b> (1)
<b>emphatically</b> (1)	<b>felt</b> (1)	<b>generally</b> (3)	<b>Hill</b> (1)
<b>employed</b> (2)	<b>Fifteen</b> (1)	<b>gentleman</b> (1)	<b>hire</b> (3)
<b>employee</b> (10)	<b>filed</b> (6)	<b>Gentlemen</b> (4)	<b>hired</b> (8)
<b>employees</b> (17)	<b>filing</b> (3)	<b>getting</b> (4)	<b>hiring</b> (2)
<b>employment</b> (11)	<b>financial</b> (1)	<b>gist</b> (1)	<b>history</b> (1)
<b>ended</b> (2)	<b>financially</b> (1)	<b>give</b> (18)	<b>hold</b> (3)
<b>engage</b> (1)	<b>find</b> (4)	<b>given</b> (19)	<b>holds</b> (1)
<b>English</b> (1)	<b>Find-2</b> (1)	<b>giving</b> (13)	<b>Hollin</b> (1)
<b>entered</b> (1)	<b>fine</b> (1)	<b>Go</b> (17)	<b>home</b> (1)
<b>entire</b> (5)	<b>finish</b> (3)	<b>goes</b> (6)	<b>honest</b> (1)
<b>E-P-H</b> (1)	<b>FINK</b> (14)	<b>going</b> (83)	<b>honestly</b> (1)
<b>E-P-H-R-A-I-M</b> (1)	<b>Fink-1</b> (4)	<b>goings</b> (1)	<b>hour</b> (5)
<b>errata</b> (7)	<b>Fink-2</b> (2)	<b>goings-on</b> (1)	<b>hours</b> (4)
<b>ESQUIRE</b> (5)	<b>Fink-3</b> (3)	<b>GOLD</b> (3)	<b>house</b> (1)
<b>establish</b> (1)	<b>Fink-4</b> (3)	<b>Good</b> (5)	<b>Huh</b> (1)
<b>estimate</b> (3)	<b>Fink-6</b> (2)	<b>goodness</b> (1)	<b>hundred</b> (3)
<b>et</b> (5)	<b>Fink-7</b> (4)	<b>gotten</b> (1)	<b>hundreds</b> (1)
<b>event</b> (3)	<b>first</b> (8)	<b>grandstand</b> (1)	
<b>Everest</b> (2)	<b>five</b> (9)	<b>gratuitous</b> (2)	< I >
<b>Everybody</b> (5)	<b>foam</b> (1)	<b>Gregg</b> (41)	<b>ID</b> (1)
<b>everybody's</b> (1)	<b>focus</b> (1)	<b>grew</b> (1)	<b>idea</b> (12)
<b>exactly</b> (3)	<b>followed</b> (1)	<b>grievances</b> (2)	<b>identification</b> (5)
<b>EXAMINATION</b> (1)	<b>Following</b> (2)	<b>GROUP</b> (1)	<b>identified</b> (1)
<b>examined</b> (1)	<b>follows</b> (1)	<b>guess</b> (5)	<b>identify</b> (1)
<b>exclaiming</b> (2)	<b>foregoing</b> (2)	<b>guests</b> (1)	<b>illegal</b> (1)
<b>Excuse</b> (2)	<b>Forget</b> (1)	<b>guy</b> (1)	<b>imagine</b> (1)
<b>Exhibit</b> (5)	<b>forgot</b> (1)	<b>guys</b> (4)	<b>implicate</b> (2)
<b>Exhibits</b> (3)	<b>form</b> (59)		<b>implication</b> (5)
<b>existence</b> (1)	<b>forth</b> (2)	< H >	<b>imply</b> (1)
<b>expert</b> (4)	<b>FORUM</b> (38)	<b>handbook</b> (3)	<b>important</b> (2)
<b>explain</b> (2)	<b>Forum's</b> (1)	<b>hands</b> (3)	<b>impression</b> (4)
<b>explained</b> (1)	<b>forward</b> (1)	<b>hanging</b> (1)	<b>inappropriate</b> (12)
<b>expressed</b> (1)	<b>foundation</b> (5)	<b>happen</b> (2)	<b>inappropriately</b> (2)
<b>extent</b> (24)	<b>four</b> (2)	<b>happened</b> (4)	<b>include</b> (2)
<b>external</b> (2)	<b>free</b> (1)	<b>happens</b> (1)	<b>included</b> (1)
<b>extremely</b> (2)	<b>F-R-Y-A-M</b> (1)	<b>happy</b> (9)	<b>includes</b> (1)
	<b>full</b> (3)	<b>harass</b> (1)	<b>Including</b> (2)
< F >	<b>full-time</b> (4)	<b>harassed</b> (1)	<b>incorrect</b> (1)
<b>face</b> (1)	<b>fundraising</b> (2)	<b>harasser</b> (4)	<b>indecipherable</b> (1)
<b>fact</b> (11)	<b>funny</b> (5)	<b>harassment</b> (43)	<b>indicates</b> (1)
<b>fact-based</b> (1)	<b>further</b> (4)	<b>hard</b> (8)	<b>indiscretions</b> (2)
<b>facts</b> (1)		<b>hardass</b> (1)	<b>inflammatory</b> (2)
<b>fair</b> (2)	< G >	<b>header</b> (1)	<b>information</b> (3)
<b>familiar</b> (16)	<b>Gabrielle</b> (1)	<b>hear</b> (1)	<b>informed</b> (1)
<b>fast</b> (2)	<b>games</b> (2)	<b>heard</b> (4)	<b>informing</b> (1)
<b>faster</b> (1)	<b>Gannone</b> (2)	<b>held</b> (5)	<b>in-house</b> (3)

inject (1)  
 injected (1)  
 instruct (5)  
 instructing (4)  
 instruction (23)  
 instructions (4)  
 intending (1)  
 intentions (1)  
 interested (1)  
 interesting (1)  
 interim (1)  
 intern (1)  
 internal (1)  
 interview (1)  
 interviewed (6)  
 interviewing (1)  
 investigate (5)  
 investigated (3)  
 investigation (5)  
 investigations (1)  
 investigative (1)  
 invited (7)  
 involve (1)  
 involved (20)  
 involves (1)  
 involving (5)  
 irrelevant (2)  
 Islamist (2)  
 Israel (2)  
 Israeli (1)  
 issue (9)  
 issues (9)

## &lt; J &gt;

Jersey (1)  
 job (7)  
 John (2)  
 JONATHAN (1)  
 July (1)  
 June (1)  
 junkie (1)  
 jury (2)

## &lt; K &gt;

K-A-R (1)  
 Karsh (7)  
 K-A-R-S-H (1)  
 Kassam (1)  
 Keep (3)

kind (4)  
 Knew (1)  
 knife (2)  
 know (95)  
 knowing (2)  
 knowledge (15)

## &lt; L &gt;

lack (4)  
 lap (1)  
 laughed (1)  
 laughing (1)  
 LAW (2)  
 lawfare (6)  
 lawyer (8)  
 leading (1)  
 Leah (2)  
 learned (5)  
 leave (1)  
 Legal (99)  
 legitimate (3)  
 lesson (1)  
 letter (4)  
 letting (1)  
 Levy (1)  
 Liberty (1)  
 lies (1)  
 life (2)  
 line (2)  
 LinkedIn (2)  
 LISA (14)  
 literally (1)  
 litigation (1)  
 living (1)  
 lodge (2)  
 lodging (1)  
 logging (1)  
 long (6)  
 look (8)  
 looked (6)  
 looking (8)  
 looks (3)  
 loop (1)  
 lot (10)

## &lt; M &gt;

maintain (1)  
 maintained (1)  
 majority (1)

making (4)  
 male (2)  
 males (1)  
 management (6)  
 manager (4)  
 managing (2)  
 MARC (21)  
 Marie (1)  
 MARKED (8)  
 Market (3)  
 Marnie (6)  
 massive (2)  
 materials (1)  
 Matt (3)  
 matter (7)  
 matters (1)  
 Matthew (3)  
 McNulty (12)  
 mean (28)  
 means (3)  
 meant (2)  
 measures (2)  
 meeting (60)  
 MEF (6)  
 MEF's (3)  
 member (1)  
 memo (11)  
 memory (3)  
 men (5)  
 mentioned (3)  
 Merville (3)  
 message (1)  
 met (2)  
 Meyer (7)  
 mic (1)  
 Michael (1)  
 MIDDLE (38)  
 Mike (1)  
 minutes (6)  
 mischaracterization (2)  
 misinformed (1)  
 missed (1)  
 misunderstand (1)  
 money (2)  
 months (1)  
 morning (2)  
 motions (1)  
 mouth (1)

move (3)  
 multiple (1)  
 mute (1)

## &lt; N &gt;

name (10)  
 names (1)  
 nature (2)  
 necessarily (3)  
 need (1)  
 needs (1)  
 neither (1)  
 nerve (1)  
 never (18)  
 New (3)  
 night (5)  
 Nods (1)  
 Nonresponsive (1)  
 Nope (8)  
 Notary (4)  
 note (1)  
 noted (4)  
 notice (3)  
 notified (1)  
 notify (1)  
 notifying (2)  
 November (15)  
 NUMBER (8)

## &lt; O &gt;

oath (2)  
 Object (65)  
 objecting (4)  
 objection (56)  
 objections (7)  
 obligated (1)  
 obstructing (1)  
 obviously (4)  
 O'CONNOR (2)  
 offensive (1)  
 office (12)  
 officials (1)  
 Oh (3)  
 Okay (42)  
 old (2)  
 once (6)  
 ones (1)  
 operations (1)  
 opinion (4)



<b>opportunities</b> (1)	<b>PLLC</b> (1)	<b>quizzing</b> (1)	<b>reminiscent</b> (2)
<b>opportunity</b> (3)	<b>point</b> (3)	<b>&lt; R &gt;</b>	<b>remote</b> (1)
<b>organization</b> (5)	<b>policies</b> (1)	<b>Raheem</b> (1)	<b>rendered</b> (1)
<b>original</b> (1)	<b>policy</b> (16)	<b>raised</b> (1)	<b>repeat</b> (16)
<b>outside</b> (11)	<b>political</b> (1)	<b>rant</b> (1)	<b>repeated</b> (1)
<b>overlap</b> (1)	<b>poor</b> (1)	<b>ranting</b> (2)	<b>repeatedly</b> (1)
<b>&lt; P &gt;</b>	<b>poorly</b> (2)	<b>read</b> (38)	<b>repeating</b> (2)
<b>P.C</b> (1)	<b>position</b> (6)	<b>reading</b> (12)	<b>report</b> (20)
<b>p.m</b> (6)	<b>positions</b> (1)	<b>ready</b> (1)	<b>reported</b> (13)
<b>PAGE</b> (3)	<b>positively</b> (2)	<b>real</b> (1)	<b>Reporter</b> (16)
<b>Pam</b> (1)	<b>positivity</b> (2)	<b>really</b> (9)	<b>Reporting</b> (4)
<b>Pamela</b> (3)	<b>possible</b> (4)	<b>reason</b> (7)	<b>reports</b> (9)
<b>paragraph</b> (1)	<b>possibly</b> (3)	<b>reasons</b> (2)	<b>representation</b> (3)
<b>part</b> (9)	<b>Pratt</b> (4)	<b>reatained</b> (1)	<b>Representing</b> (3)
<b>particular</b> (7)	<b>predated</b> (1)	<b>recall</b> (5)	<b>reputation</b> (1)
<b>parties</b> (2)	<b>PRESENT</b> (8)	<b>receipt</b> (2)	<b>require</b> (2)
<b>part-time</b> (1)	<b>presented</b> (2)	<b>receive</b> (8)	<b>requires</b> (1)
<b>Patricia</b> (7)	<b>president</b> (3)	<b>received</b> (13)	<b>reserve</b> (1)
<b>Patrician</b> (1)	<b>prevent</b> (6)	<b>receiving</b> (17)	<b>reserved</b> (1)
<b>pay</b> (2)	<b>previous</b> (7)	<b>recess</b> (1)	<b>respect</b> (10)
<b>paying</b> (1)	<b>previously</b> (2)	<b>recipient</b> (5)	<b>respective</b> (1)
<b>pending</b> (2)	<b>prior</b> (2)	<b>recognize</b> (1)	<b>respond</b> (1)
<b>Penn</b> (1)	<b>privilege</b> (30)	<b>recognition</b> (1)	<b>responded</b> (2)
<b>PENNSYLVANIA</b> (7)	<b>privileged</b> (7)	<b>recollection</b> (1)	<b>responding</b> (3)
<b>people</b> (6)	<b>probably</b> (6)	<b>recollections</b> (1)	<b>response</b> (7)
<b>percent</b> (2)	<b>problem</b> (2)	<b>record</b> (18)	<b>responsibilities</b> (1)
<b>perfectly</b> (1)	<b>procedures</b> (1)	<b>recorded</b> (1)	<b>responsive</b> (1)
<b>perform</b> (1)	<b>process</b> (2)	<b>refer</b> (5)	<b>retail</b> (1)
<b>performed</b> (1)	<b>produced</b> (1)	<b>reference</b> (2)	<b>retaliation</b> (21)
<b>performing</b> (1)	<b>Project</b> (9)	<b>references</b> (1)	<b>Return</b> (1)
<b>period</b> (1)	<b>Projects</b> (4)	<b>referred</b> (1)	<b>reviewed</b> (4)
<b>permission</b> (2)	<b>promptly</b> (1)	<b>referring</b> (3)	<b>RICO</b> (4)
<b>person</b> (5)	<b>proofing</b> (1)	<b>refusal</b> (1)	<b>ridiculous</b> (2)
<b>personal</b> (2)	<b>proofreading</b> (1)	<b>refuse</b> (1)	<b>RIESER</b> (1)
<b>personally</b> (1)	<b>propounded</b> (1)	<b>refusing</b> (3)	<b>right</b> (57)
<b>personnel</b> (8)	<b>provide</b> (1)	<b>regard</b> (7)	<b>Rights</b> (1)
<b>pervious</b> (1)	<b>provided</b> (6)	<b>regarding</b> (1)	<b>ring</b> (1)
<b>Philadelphia</b> (4)	<b>provides</b> (1)	<b>regardless</b> (2)	<b>Robinson</b> (3)
<b>phone</b> (1)	<b>Public</b> (6)	<b>related</b> (5)	<b>role</b> (1)
<b>pillow</b> (2)	<b>pulled</b> (1)	<b>relates</b> (1)	<b>roles</b> (2)
<b>Pipes</b> (19)	<b>put</b> (11)	<b>relating</b> (1)	<b>Roman</b> (38)
<b>Place</b> (5)	<b>puts</b> (2)	<b>relation</b> (1)	<b>Roman's</b> (8)
<b>plain</b> (1)	<b>putting</b> (1)	<b>relationship</b> (1)	<b>room</b> (4)
<b>Plaintiff</b> (2)	<b>&lt; Q &gt;</b>	<b>relative</b> (1)	<b>rules</b> (2)
<b>play</b> (2)	<b>question</b> (99)	<b>relevant</b> (2)	<b>run</b> (1)
<b>pleasantries</b> (1)	<b>QUESTIONED</b> (1)	<b>remarks</b> (1)	<b>running</b> (1)
<b>please</b> (11)	<b>questioning</b> (1)	<b>remember</b> (106)	<b>&lt; S &gt;</b>
<b>plenty</b> (2)	<b>questions</b> (18)	<b>remembered</b> (1)	<b>saw</b> (4)
		<b>remembers</b> (4)	

<b>saying</b> (7)	<b>social</b> (1)	<b>Subject</b> (8)	<b>think</b> (22)
<b>says</b> (14)	<b>somebody</b> (2)	<b>subjects</b> (1)	<b>thinking</b> (1)
<b>scared</b> (2)	<b>sorry</b> (11)	<b>substance</b> (2)	<b>thinks</b> (2)
<b>screen</b> (2)	<b>sort</b> (1)	<b>substantive</b> (1)	<b>thousands</b> (4)
<b>scroll</b> (8)	<b>sorts</b> (1)	<b>suggest</b> (1)	<b>threat</b> (1)
<b>sealing</b> (1)	<b>sound</b> (1)	<b>suggesting</b> (1)	<b>threaten</b> (1)
<b>second</b> (1)	<b>sounds</b> (1)	<b>suggestion</b> (1)	<b>threatening</b> (1)
<b>secure</b> (1)	<b>space</b> (2)	<b>Suite</b> (2)	<b>threats</b> (1)
<b>see</b> (18)	<b>speaking</b> (2)	<b>summer</b> (11)	<b>three</b> (8)
<b>seen</b> (4)	<b>spearheading</b> (2)	<b>super</b> (1)	<b>time</b> (31)
<b>seminal</b> (2)	<b>specialist</b> (1)	<b>supervise</b> (4)	<b>times</b> (11)
<b>send</b> (12)	<b>specific</b> (1)	<b>supervised</b> (1)	<b>title</b> (6)
<b>sending</b> (5)	<b>Specifically</b> (5)	<b>supervising</b> (1)	<b>titles</b> (2)
<b>sends</b> (1)	<b>speculate</b> (1)	<b>supervision</b> (1)	<b>today</b> (13)
<b>senior</b> (1)	<b>spell</b> (1)	<b>supervisor</b> (2)	<b>Today's</b> (1)
<b>sent</b> (15)	<b>spelled</b> (2)	<b>supposed</b> (3)	<b>told</b> (11)
<b>separate</b> (1)	<b>speller</b> (1)	<b>sure</b> (18)	<b>tolerate</b> (1)
<b>serious</b> (8)	<b>spent</b> (1)	<b>swear</b> (1)	<b>Tommy</b> (3)
<b>session</b> (1)	<b>spew</b> (1)	<b>sworn</b> (1)	<b>ton</b> (1)
<b>set</b> (1)	<b>spoke</b> (1)	< T >	<b>top</b> (2)
<b>SETH</b> (22)	<b>spoken</b> (1)	<b>table</b> (1)	<b>topic</b> (1)
<b>seth@dereksmithlaw.c</b>	<b>sponsors</b> (1)	<b>take</b> (4)	<b>topics</b> (1)
<b>om</b> (1)	<b>spring</b> (7)	<b>taken</b> (7)	<b>totally</b> (1)
<b>sex</b> (1)	<b>staff</b> (3)	<b>takes</b> (3)	<b>train</b> (1)
<b>sexual</b> (26)	<b>staffer</b> (1)	<b>talk</b> (7)	<b>trained</b> (1)
<b>sexually</b> (4)	<b>staffers</b> (1)	<b>talked</b> (1)	<b>trainings</b> (1)
<b>sgold@discrimlaw.net</b>	<b>Standard</b> (1)	<b>talking</b> (13)	<b>trains</b> (1)
<b>(1)</b>	<b>stands</b> (2)	<b>talks</b> (3)	<b>transcript</b> (1)
<b>S-H</b> (1)	<b>staring</b> (1)	<b>tasks</b> (1)	<b>transcription</b> (1)
<b>Shargel</b> (2)	<b>started</b> (10)	<b>tell</b> (15)	<b>trial</b> (1)
<b>Shargel's</b> (2)	<b>state</b> (1)	<b>telling</b> (5)	<b>tried</b> (1)
<b>sheet</b> (7)	<b>statement</b> (1)	<b>ten</b> (3)	<b>trip</b> (1)
<b>shortly</b> (1)	<b>statements</b> (2)	<b>tens</b> (1)	<b>true</b> (4)
<b>show</b> (17)	<b>STATES</b> (2)	<b>terminated</b> (1)	<b>truly</b> (1)
<b>showing</b> (1)	<b>Station</b> (2)	<b>termination</b> (1)	<b>try</b> (4)
<b>shrugs</b> (1)	<b>staying</b> (1)	<b>terms</b> (1)	<b>trying</b> (8)
<b>Sid</b> (1)	<b>stenographic</b> (1)	<b>territory</b> (1)	<b>Tuesday</b> (3)
<b>SIDNEY</b> (2)	<b>step</b> (1)	<b>test</b> (1)	<b>turn</b> (2)
<b>sign</b> (4)	<b>stepping</b> (1)	<b>testified</b> (4)	<b>turned</b> (2)
<b>signature</b> (3)	<b>Steven</b> (1)	<b>testify</b> (4)	<b>twelfth</b> (1)
<b>Significant</b> (2)	<b>stipulated</b> (1)	<b>testifying</b> (2)	<b>two</b> (17)
<b>signing</b> (1)	<b>stole</b> (1)	<b>testimony</b> (6)	<b>two-and-half</b> (1)
<b>simple</b> (2)	<b>Stop</b> (3)	<b>text</b> (1)	<b>tying</b> (1)
<b>single</b> (2)	<b>store</b> (1)	<b>Thank</b> (6)	< U >
<b>sit</b> (3)	<b>straight</b> (4)	<b>thanked</b> (1)	<b>Uh-huh</b> (3)
<b>Sitting</b> (2)	<b>Street</b> (5)	<b>theory</b> (1)	<b>uncomfortable</b> (3)
<b>slander</b> (1)	<b>strike</b> (4)	<b>thing</b> (4)	<b>understand</b> (5)
<b>smartass</b> (1)	<b>strong</b> (1)	<b>things</b> (10)	<b>understanding</b> (3)
<b>SMITH</b> (1)	<b>stuff</b> (2)		

**understood** (1)  
**UNITED** (2)  
**use** (5)  
  
**< V >**  
**vaguely** (2)  
**valid** (1)  
**vast** (1)  
**veiled** (2)  
**verbal** (1)  
**versus** (2)  
**victims** (3)  
**video** (7)  
**Videographer** (4)  
**Videotaped** (1)  
**violate** (3)  
**violating** (2)  
**visit** (1)  
**vs** (1)  
  
**< W >**  
**W-2** (1)  
**Wait** (4)  
**waiting** (1)  
**waived** (1)  
**WALTON** (2)  
**want** (29)  
**wanted** (1)  
**Washington** (1)  
**Watch** (4)  
**watched** (1)  
**way** (8)  
**ways** (7)  
**website** (1)  
**week** (2)  
**weekly** (9)  
**weeks** (2)  
**weird** (1)  
**welcome** (1)  
**Well** (54)  
**went** (6)  
**we're** (19)  
**we've** (1)  
**whispering** (1)  
**WILLIAM** (1)  
**wisely** (1)  
**WITNESS** (94)  
**WITNESSED** (1)  
**Wolson** (1)

**woman** (1)  
**women** (7)  
**word** (3)  
**words** (1)  
**work** (23)  
**worked** (3)  
**working** (4)  
**workplace** (16)  
**works** (4)  
**world** (1)  
**worth** (1)  
**wrap** (2)  
**wrong** (3)  
**wrongful** (1)  
  
**< Y >**  
**Yeah** (40)  
**year** (4)  
**year-and-a-half** (1)  
**years** (5)  
**Yep** (11)  
**yes-or-no** (4)  
**yesterday** (2)  
**Yonchek** (3)  
  
**< Z >**  
**zero** (1)